

# TSD File Inventory Index

Date: October 2, 2001

Initial: CMG/encas

Facility Name: <u>Pump - Test of Illinois, Inc. (One field site)</u>		
Facility Identification Number: <u>11 D 063 698 971</u>		
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>
<b>A.2 Part A / Interim Status</b>		.1 Correspondence
.1 Correspondence	N	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	<b>C.1 Compliance - (Inspection Reports)</b>
.3 Part A Application and Amendments	Y	<b>C.2 Compliance/Enforcement</b>
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
<b>A.4 Closure/Post Closure</b>	Y	.3 State Prelim. Investigation Memos
.1 Correspondence	Y	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	Y	<b>D. 2 Corrective Action/Facility Investigation</b>
<b>A.5 Ambient Air Monitoring</b>		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
<b>B.1 Administrative Record</b>		.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	X
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments:

*Reports do not just fit individual folders/schedule!*

**A.2 Part A/  
Interim Status**

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved MB No. 2050-0028 Expires 12/31/02  
CS: N-246-E-A-T

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

JAN 17 2002

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. Initial Notification

☒

B. Subsequent Notification  
(Complete item C)

Installation's EPA ID Number

ILD063698971

## II. Name of Installation (Include company and specific site name)

P E R M A T R E A T o f I l l i n o i s

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1 8 0 0 P e r m a t r e a t D r i v e

Street (Continued)

P O B o x 9 9

City or Town

M a r i o n

State

Zip Code

I L

6 2 9 5 9 -

County Code

County Name

1 0 0 W i l l i a m s o n

## IV. Installation Mailing Address (See instructions)

Street or P.O. Box

P O B o x 9 9

City or Town

M a r i o n

State

Zip Code

I L

6 2 9 5 9 -

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

B o n d

S h a w n

Job Title

Phone Number (Area Code and Number)

O w n e r

6 1 8 - 9 9 7 - 5 6 4 6

## VI. Installation Contact Address (See instructions)

A. Contact Address  
Location Mailing

☐☒

B. Street or P.O. Box

P O B o x 9 9

City or Town

M a r i o n

State

Zip Code

I L

6 2 9 5 9 -

## VII. Ownership (See instructions)

Name of Installation's Legal Owner

S h a w n a n d S a r a B o n d

Street, P.O. Box, or Route Number

1 3 1 5 7 B e n n e t t R d.

City or Town

M a r i o n

State

Zip Code

I L

6 2 9 5 9 -

Phone Number (Area Code and Number)

6 1 8 - 9 9 6 - 3 2 4 9

B. Land Type

C. Owner Type

D. Change of Owner Indicator

Yes

X

No

Month

Day

Year

01 01 2002

1/25/02  
ph



ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

## A. Hazardous Waste Activities

1. Generator (See Instructions)  
☐ a. Greater than 1000kg/mo (2,200 lbs.)  
☒ b. 100 to 1000 kg/mo (220-2,200 lbs.)  
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)  
☐ a. For own waste only  
☐ b. For commercial purposes
- Mode of Transportation  
☐ 1. Air  
☐ 2. Rail  
☐ 3. Highway  
☐ 4. Water  
☐ 5. Other - specify \_\_\_\_\_
- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Exempt Boiler and/or Industrial Furnace  
☐ a. Smelting, Melting, and Refining Furnace Exemption  
☐ b. Small Quantity On-Site Burner Exemption
- ☐ 5. Underground Injection Control

## C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)  
☐ a. Transporter  
☐ b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)  
☐ a. Processor  
☐ b. Re-refiner
- ☐ 3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer  
☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner  
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

## B. Universal Waste Activity

- ☐ Large Quantity Handler of Universal Waste

## IX. Description of Hazardous Wastes (Use additional sheets if necessary)

## A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1 F 0 3 5	2	3	4	5	6
7	8	9	10	11	12

## B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See Instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	1	2	3	4
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## C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See Instructions.)

1	2	3	4	5	6
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## X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Name and Official Title (Type or print)

Date Signed

Owner

01-10-02

## XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD063698971

INSTALLATION ADDRESS

PERMA-TREAT OF ILLINOIS INC  
PO BOX 99 N CARBON IND PK DR  
MARION IL 62959

N CARBON & IND PK DR  
MARION IL 62959

m  
5/2











ILD 063698971

Notif

# Perma-Treat Of Illinois, Inc.

CCA Pressure Treated Wood Products

Landscape Ties - Treated Lumber - Mine Products

N. Carbon St. & Industrial Park Dr. • P.O. Box 99 • Marion, Ill. 62959 • (618)997-5646

August 2, 1991

EPA  
Region 5  
RCRA Actives  
230 S Dearborn  
Chicago IL 60604

RECEIVED

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Gentlemen:

On December 6, 1990 (55 FR 50450) EPA published a final rule listing as hazardous three categories of wastes from wood preserving operations. On June 13, 1991 (56 FR 27332) EPA published an administrative stay of the waste listings which, among other things, conditionally extended the effective date.

In accordance with the stay, we are hereby providing notice that Perma-Treat of Il. Inc. will upgrade their existing drip pad by February 6, 1992. Moreover, Perma-Treat will use its best efforts to minimize drippage that occurs during the duration of the stay.

Sincerely yours,



CAROLYN J BOND  
VICE-PRESIDENT

ksd





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

USEPA

217/524-3300

August 6, 2002

Certified Mail

7001 2510 0002 3280 3022

Perma-Treat of Illinois, Inc.  
1800 Perma-Treat Drive  
P.O. Box 99  
Marion, Illinois 62959

Re: 1990555010 -- Williamson County  
Perma-Treat of Illinois, Inc.  
ILD063698971  
RCRA Closure File

Gentlemen:

This is in response to your January 31, 2002 letter. Your letter was a response to a January 30, 2001 letter from the Illinois EPA to Perma-Treat of Illinois, Inc. Your letter requested information as to why Perma-Treat of Illinois, Inc. is not considered "under control" and what needs to be done for your facility to be considered "under control."

At this time, the Illinois EPA is retracting its January 30, 2001 letter. Based on a further review of the Illinois EPA's files, the only unit at your facility subject to the GPRA post-closure universe was a hazardous waste pile (S03). Based on information contained in the Illinois EPA files, the hazardous waste pile has been "clean" closed. Because the hazardous waste pile is the only unit subject to GPRA post-closure universe reporting, and because the hazardous waste pile has been "clean" closed, your facility is in fact under control.

If you have any questions regarding this letter, please contact me at the above address or phone number.

Sincerely,

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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cc: Greg Czajkowski, U.S. EPA

GEORGE H. RYAN, GOVERNOR



H. Croke

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

January 30, 2001

Perma-Treat of Illinois, Inc.  
602 North Carbon  
Marion Industrial Park  
Marion, Illinois 62959

Re: 1990555010 - Williamson County  
Perma-Treat of Illinois, Inc.  
ILD063698971  
RCRA Closure File

Gentlemen:

In September 1997, the USEPA published its national Strategic Plan, setting forth clear environmental goals through the year 2005. As required under the Government Performance and Results Act ("GPRA"), the Strategic Plan describes the USEPA's mission and ten broad goals that will serve as the framework for the USEPA's planning and resource allocation decisions. The USEPA based its goals on public priorities as articulated by Congress in the form of statutory mandates and as expressed in direct public comment.

Goal Number 5 in the USEPA's Strategic Plan is as follows:

"Better waste management, restoration of contaminated waste sites, and emergency response."

The USEPA's stated objectives under Goal 5 include reducing or controlling risks to human health and the environment at over 375,000 contaminated Superfund, RCRA, UST, and brownfield sites, and managing the roughly 14,000 facilities defined by RCRA Subtitles C, and D *according to practices that prevent dangerous releases to the environment*. More specifically related to RCRA hazardous waste facilities, the EPA has committed to preventing dangerous releases to air, soil, and groundwater at 80% of such facilities in the United States by the year 2005. Because this commitment is made as part of its GPRA strategy, the USEPA regards this as one of its highest priorities.

Recently, USEPA Region 5 established an inventory or "universe" of RCRA facilities which fall under this 80% commitment. The status of RCRA facilities as of October 1, 1997, was selected to establish an overall baseline universe (i.e., the list of 100% of affected facilities). The current

GEORGE H. RYAN, GOVERNOR



status of these same RCRA facilities has been used to determine the percentage of facilities that are at this time "under control" (i.e., facilities where all hazardous waste units are being managed according to practices that prevent dangerous releases).

To gain a better understanding of exactly what efforts will be necessary to meet the commitment to have 80% of RCRA facilities under control by the year 2005, the USEPA has further broken down the universe of facilities into separate subset universes listing (1) RCRA facilities with operating hazardous waste units not involving land disposal, and (2) RCRA facilities which have closed or will likely close with hazardous waste in place and hence need post-closure care. Some facilities are listed only in the operating universe ("OPU"), some are listed only in the post-closure universe ("PCU"), and some facilities are listed in both. Comparing these two lists quickly demonstrated that the majority of facilities in Region 5 with operating RCRA units already have permits and are therefore "under control," but also that much work remains before the post-closure universe can achieve the 80% number.

The USEPA has decided that it will not be necessary in all cases for a facility with one or more land disposal units to have a full post-closure permit in place (under 40 CFR 264 or the equivalent state regulations) in order for that facility to be considered as "under control." There will be some flexibility for facilities which have an enforceable agreement in place with its state environmental USEPA to be considered "under control" for the purposes of the 80% commitment. However, any such agreement would also need to include a groundwater monitoring and post-closure care scheme deemed equivalent to that in a RCRA post-closure permit (i.e., 40 CFR Part 264 Subparts F and G or the state equivalent). Under appropriate circumstances, formally including the units under corrective action requirements in a RCRA permit or RCRA administrative order (40 CFR 264.101 or RCRA 3008(h), respectively) may be another option for bringing a facility with hazardous waste post closure units under control.

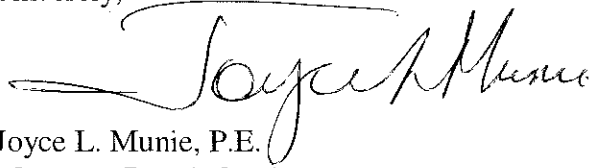
This letter is being sent to you because your facility is currently listed on USEPA's and Illinois EPA's GPRA post-closure universe and is shown as not yet under control. My purpose in sending this letter is to alert you to the importance that the USEPA and Illinois EPA now place on moving facilities such as yours into "under control" status, and to urge you to contact and work with the Illinois EPA to explore the various options for achieving this status. Many facilities which are currently under an enforceable interim status closure plan might be able to work with Illinois EPA to upgrade the groundwater monitoring and post-closure care language in those documents, expeditiously bringing the facility to "under control" status.

Thank you for your cooperation in this matter. With your help, the public can be assured that the country's wastes will be stored, treated, and disposed in ways that prevent harm to people and to the natural environment.

Page 3

If you have any questions about this letter, or would like to explore post closure options that may be open to you, please contact me at the above address or phone number.

Sincerely,

A handwritten signature in cursive script, reading "Joyce L. Munie". The signature is written in black ink and is positioned above the printed name.

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

JLM:SCC\mls013481.doc

cc: Harriet Croke, USEPA



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

P435 100 707 PINK  
C-653-M

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

July 23, 1993

Perma-Treat of Illinois, Inc.  
Attn: Rudy Bond  
Carbon Street & Industrial Park Drive  
Marion, Illinois 62959

Re: 1990555010 -- Williamson County  
Perma-Treat of Illinois, Inc.  
ILD063698971  
Date Received: May 13, 1993  
Log #C-653-M-1  
RCRA-Closure

Dear Mr. Bond:

The Agency has received and reviewed the letter from Stephen F. Hedinger of Mohan, Alewelt, Prillaman & Adami on behalf of Perma-Treat dated May 13, 1993 and received by the Agency May 13, 1993. The request in essence desires the deletion of Conditions 5-11 of the approved closure plan dated December 11, 1992 regarding the closure of the hazardous waste pile area at the above-referenced facility as well as a time extension. The modification request centered around deleting the requirements to steam clean and triple rinse the pad and inspect for cracks. It also dealt with deleting the requirements to take soil samples away from the pad. Your final closure plan to close the hazardous waste pile area (S03) at the above-referenced facility is hereby approved subject to the following conditions and modifications:

1. The Agency disapproves the request to delete paragraphs 5-11. The reason for requiring steam cleaning and triple rinsing of the pad and analyzing the soil is to ensure the pad is clean and that if there was a release of hazardous waste to the environment it did not impact the soil beneath the pad. Both of these requirements are necessary to ensure the requirements of 35 IAC 725.211, 725.214 and 725.358(a) are met. Certain modifications have however been made to Conditions 6, 8 and 10 below to reflect some of the requested modifications.
2. The request for an extension of the time required to complete closure activities is approved. Closure activities must be completed by February 1, 1994. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by April 1, 1994. These dates may be revised if Perma-Treat finds that additional time is required to complete the prescribed closure activities and Perma-Treat demonstrates it is attempting to complete the required closure activities in a timely manner.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. The waste manifest numbers.
- d. Copies of the waste manifests.
- e. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
- f. A chronological summary of closure activities and the cost involved.
- g. Color photo documentation of closure. Document conditions before, during and after closure.
- h. Tests performed, methods and results.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:



Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #33  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

3. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
4. If contamination is detected, the Agency must be notified in writing within fifteen (15) days. A revised closure plan addressing remediation of the contamination detected must be submitted within timeframes established by the Agency.
5. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
6. The concrete surface directly east of the "Sump Pit" shown in Figure No. 4 of the closure plan (an area approximately 30' (east/west) x 63' (north/south) in size) shall be visually inspected, photographed and any residue adhering to the surfaces must be removed by scraping and/or brushing. This area is the approximate location of the former waste pile. Following this, the concrete surface must be steam cleaned and triple rinsed. Decontamination of these surfaces will be considered complete after they are triple rinsed. All wash and rinse water shall be collected and put back into the stream of copper, chromium, arsenic and water solution which would normally treat the wood. The Marion Regional Office of IEPA shall be notified at least one week prior to the date that the decontamination efforts are to take place and be given the opportunity to observe the decontamination efforts.

After cleaning the concrete surface, an independent registered professional engineer shall inspect the integrity of the concrete surfaces. This surface shall be inspected for cracks which penetrate through the concrete. In addition, all construction joints must be inspected to ensure they are watertight. The results of this inspection

shall be: (1) documented in the form of a report, and (2) certified by an independent Illinois registered professional engineer in accordance with 35 IAC 702.106. A copy of this report must be submitted along with the closure documentation report required by Condition 2 above.

The report must include:

- a. The results of the inspection;
  - b. Scaled drawings showing the location of all cracks and construction joints observed during the inspection;
  - c. Conclusions reached regarding the potential for hazardous wastes and/or hazardous constituents to migrate through any cracks or construction joints observed in the areas of concern;
  - d. Justification for the conclusions reached (e.g., information must be provided which indicates that any construction joints in the areas of concern are indeed watertight); and
  - e. Photographs to support the conclusions reached.
7. If joints or other defects are found in the base of the storage areas during the inspection required by Condition 6 above which would potentially allow hazardous waste or hazardous constituents to migrate through them, then soil samples must be collected from beneath them to determine if hazardous waste or hazardous constituents have been released to the underlying soil.
- a. Samples must be collected from at least one location along each joint/crack. The location from which samples are collected along each crack must be biased to any area where there is staining or any low-lying area along the joint/crack.
  - b. Samples must be collected once every 10' along each individual crack;
  - c. Samples must be collected from 0"-6" and from 18"-24" at each location;
  - d. The procedures used to collect and analyze all samples shall be carried out in accordance with the procedures approved in this letter.
8. Based upon a review of available information, the waste pile which is the subject of this closure plan was located on the concrete area which is located in the southeast corner of the "Roofed Process Area, Concrete and Control Room" shown in Figure No. 4 of the closure plan (the area directly east of the "Sump Pit" as shown in the referenced figure). To demonstrate no soil is present in the area surrounding the former waste pile area, soil samples must be collected from the area directly south and east of this area as follows:

- a. Samples must be collected from the area directly east of the subject area at the following locations:
    1. Three locations approximately three (3) feet from the edge of the concrete. The first location shall be approximately five (5) feet from the southeast corner of the structure. The other two locations shall be spaced approximately 10 feet apart in a northerly direction parallel to the edge of the concrete.
    2. Three locations approximately 10' east of the three location identified above.
  - b. Samples must be collected from the area directly south of the subject area at the following locations:
    1. Three locations approximately three (3) feet from the edge of the concrete. The first location shall be approximately five (5) feet from the southeast corner of the concrete surface. The other two locations shall be spaced approximately 10 feet apart in a westerly direction parallel to the edge of the concrete.
    2. Three locations approximately 10' south of the three locations identified above.
9. Soil samples must be collected at each location identified in Condition 8 from 0"-6" and 18"-24" below the ground surface. Each soil sample must be analyzed for arsenic, chromium, and copper using the TCLP test (Method 1311 in SW-846).
10. To ensure the clean-closure requirements of 35 IAC 725.211, 725.214 and 725.358(a) are met, all soil which remains beneath and around the location of the former waste pile must meet the following clean-up objectives (CUOs):

<u>Constituent</u>	<u>Objective (mg/l)*</u>
Arsenic	0.05
Chromium	0.1
Copper	0.65

These objectives are based upon the analysis of the extract of the TCLP test described in Method 1311 of SW-846. It must be noted that no information was provided to support the position that Class 2 groundwater underlies the site, which is necessary before soil clean-up objectives can be established based on the protection of Class 2 groundwater. Unless such information is provided, the Agency must establish soil clean-up objectives based on the protection of Class 1 groundwater.

11. If soil is encountered during the sampling/analysis efforts required by Conditions 8 and 9 above which contains contaminants above the CUOs established in Condition 10 above, then additional soil samples must be collected, as necessary to determine the horizontal and vertical extent of soil which exceed these CUOs. The procedures used to collect and analyze

these samples must be in accordance with those approved in this letter. The procedures used to determine the horizontal and vertical locations from which soil samples are to be collected in accordance with Sections 13.a and 13.b of the Agency's RCRA closure plan instructions (revised December 1990). However, no random sampling shall be used in making this determination.

12. All soil samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846) and Attachment 7 to this Agency's closure plan instruction package. When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15. If possible, your sampling program should be extensive enough to determine the lateral and vertical extent of contamination to the detection limit (PQLs) referenced above.
13. In addition to scraping steam cleaning and triple rinsing the concrete pads, all equipment and devices involved in the closure of the area where the waste pile was once located shall be steam cleaned and triple rinsed.
14. Contaminated soil may be excavated and disposed off-site at any time during closure. The goal of any such effort should be to remove all soil which exceeds the established cleanup objectives.
15. If soil excavation is the chosen remedial action for any soil contamination encountered, then soil samples must be collected for analysis from the bottom and sidewalls of the final excavation from which contaminated soil was removed. This sampling and analysis effort must be (1) sufficient to demonstrate that the remaining soil meets the established cleanup objectives and (2) carried out in accordance with the following procedures:
  - a. A grid system as set forth in Section 13.b of the Agency's closure plan instructions must be established over the excavation.
  - b. Samples must be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.



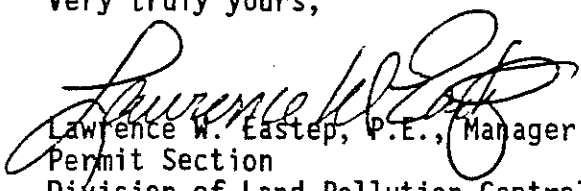
- c. Samples must be collected 6"-12" from the top of the excavation wall at each grid intersection around the excavation perimeter. Samples must also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.
  - d. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.
  - e. Soil samples which must be analyzed for volatile organic compounds shall be collected using Attachment 7 of the Agency's RCRA closure plan instructions. In addition, such samples must be collected 6"-12" beneath the floor/sidewalls of the excavation to minimize the possibility of volatilization of the contaminants prior to the collection of the samples.
  - f. No random sampling shall be conducted to verify that the cleanup objectives have been met.
16. If soil excavation is the chosen remedial action for any soil contamination encountered, then additional soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the established cleanup objectives. Additional samples must be collected and analyzed in accordance with Condition 15 above from areas where additional soil has been removed.
17. If a decision is made that soil excavation and off-site disposal is not the preferred remedial action for this closure, then the Agency must be notified in writing when such a determination is made. At that time, the Agency will provide Perma-Treat with additional guidance regarding the information which must be submitted to the Agency for review and approval relative to the alternative remedial action which the facility would like to implement.
18. The Agency must be notified in writing if, at any time, it is found that soil contamination above the established cleanup objectives extends to near the water table. This notification must be made within 15 days after such a discovery is made. A plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval within 60 days after the initial written notification is submitted to the Agency.
19. If groundwater is encountered during any soil removal or sampling activities prior to reaching soil which meets the cleanup objectives, the plan to investigate for potential groundwater contamination must be submitted to the Agency for review and approval. Such a plan must be submitted within sixty (60) days after the date that the analytical results are received which indicate that soil contamination extends to the water table. In addition, the Agency shall be notified in writing of this discovery within five (5) days after these analytical results are received.

20. If clean closure cannot be achieved pursuant to 35 IAC 725.211, 725.214 and 725.358(a), then a modified closure plan and a post-closure plan prepared pursuant to 35 IAC Section 725, Subpart G must be submitted to the Agency for review and approval within 60 days of such a determination.
21. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.
22. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).
23. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Should you have any questions regarding this matter, please contact William T. Sinnott II at 217/524-3300.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control  
Bureau of Land

bcc: Bureau File  
Marion Region  
Jim Moore  
Bill Sinnott  
Amy Dragovich

LWE:WTS:sf/sp/497Y,1-8  
JKA

Attachment: Closure Certification Statement

cc: USEPA Region V -- George Hamper

ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-653-M-1

The former hazardous waste pile (S03) at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator      Date

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.      Date

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Mailing Address of P.E.:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Seal of P.E.:  
\_\_\_\_\_

WTS:sf/sp/497Y,9



DATE: September 23, 1991

TO: Land Division File

FROM: G. E. Steele, DLPC/FOS Region 7 *GES*

SUBJECT: 1990555010 - Williamson Co.  
Perma-Treat of Illinois  
ILD063698971

A brief follow-up visit at the Perma-Treat wood preserving plant was conducted on September 23, 1991 by this author. I met with Ms. Carolyn Bond, Mr. Rudy Bond, and Mr. Greg Edmonds. Perma-Treat had received their CIL, and had several questions. Most of the questions centered around the corrective action needed for the waste pile. I explained that the two options for this were to: (a) permit it as a waste pile storage area, or (b) go through RCRA closure. They decided to go through closure. The basic requirements of closure were briefly discussed, including waste removal, decontamination of the pad and removal of adjacent contaminated soil. Mr. Bond said that Chemical Waste Management had already been contacted about waste removal. He said they were going to wash down the pad and scrape the soil at this time.

I recommended waiting on a majority of the closure work until after the plan was approved. Removal of the current waste inventory, and disposal of the obviously contaminated adjacent soil is the most I could recommend prior to approval. To do more would be at their own risk, should the approved plan be different than what actions they did. One soil sample from east of the pad was analyzed. Mr. Edmonds said the sample was taken from eight (8) inches down. The analysis, dated 8-2B-91, shows not detected for chrome and arsenic.

Ponding of treatment chemical in the drip track area was also discussed. Commitment to going through closure would be part of an acceptable compliance plan. A firm has been obtained to seal the drip track area in accordance with the new wood preserving requirements.

GES:cs/1241L/9-25-91

**C.2 Compliance/  
Enforcement**

RESPONSE TO 6/9/91 PECL

199055 5010-Williamson

Perma-Treat of Illinois  
ILD 063698971  
Compliance

MOHAN, ALEWELT, PRILLAMAN & ADAMI

LAWYERS

SUITE 325

FIRST OF AMERICA CENTER

1 OLD CAPITOL PLAZA NORTH

SPRINGFIELD, ILLINOIS 62701-1323

EDWARD J. ALEWELT

FRED C. PRILLAMAN

PAUL E. ADAMI

CHERYL R. STICKEL

STEPHEN F. HEDINGER

JAMES T. MOHAN, OF COUNSEL

TELEPHONE

(217) 528-2517

FAX

(217) 528-2553

February 13, 1992

Deanne Virgin  
Compliance Unit  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

RECEIVED

FEB 14 1992

IEPA-DLPC

Re: 1990555010-Williamson County  
Perma-Treat of Illinois  
ILD063698971  
Compliance File

Dear Ms. Virgin:

This letter is to apprise you of activities undertaken by PermaTreat to resolve the issues set forth in the Compliance Inquiry Letter dated September 19, 1991, concerning a waste pile at PermaTreat's Marion, Illinois facility. On January 7, 1991, officials from PermaTreat met with Mr. Charles Northrup and Mr. Gary Steele from the Agency to discuss resolution of this matter. Pursuant to that meeting, PermaTreat has agreed to apply for a permit to close the waste pile. PermaTreat is currently involved in efforts to accomplish that closure.

It is PermaTreat's intention to close the waste pile pursuant to §703.159(b), which requires compliance with §724.358. Along those lines, it is and will be PermaTreat's position that the waste pile, as determined by the Agency, meets the liner requirements of §724.351(a)(1). Upon the bases of these positions, PermaTreat will forthwith apply to the Agency both for a closure permit and for an Agency equivalency determination under §703.159.

Deanne Virgin  
Springfield, IL

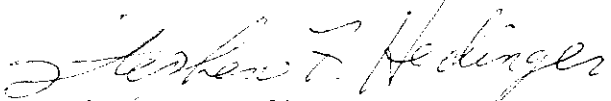
February 13, 1992  
Page 2

As stated above, our closure plan will be submitted forthwith. Should you or any other Agency personnel have any questions concerning our activities in the meantime, please feel free to contact me, or the Professional Engineer engaged to oversee the closure activities, Mr. John Gordon, of Gordon and Price, Inc., Marion, Illinois.

Very truly yours,

MOHAN, ALEWELT, PRILLAMAN & ADAMI

By

  
Stephen F. Hedinger

SFH/drm

cc: Charles Northrup  
Gary Steele



File

217/782-6741

Refer to: 1900555010 -- Williamson County  
Perma-Treat of Illinois  
ILD0083058571  
Compliance File

PRE-ENFORCEMENT CONFERENCE LETTER

Certified #P 681 209 708

December 12, 1991

Perma-Treat of Illinois  
Attn: Ms. Carolyn Bond  
Industrial Park Drive  
Marion, Illinois 62961

Dear Ms. Bond:

The Agency has previously advised Perma-Treat of Illinois of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement conference to be held at the Illinois Environmental Protection Agency's Marion Regional Office, 2309 West Main Street, Marion, Illinois. The purpose of this Conference will be:

1. To discuss the validity of the apparent violations noted by Agency staff, and
2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for January 7, 1992, at 10:00 am. If this arrangement is inconvenient, you may arrange for an alternative date and time.

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.





Page 2

If either the above mentioned conference date or time is inconvenient or if you have any questions regarding this letter, please contact Mr. Gerald Steele at 570/57-4371.

Sincerely,

*E. William Raelinski*  
by BJJ

E. William Raelinski, Manager  
Planning and Reporting Section  
Division of Land Pollution Control

ENR:GS.DV:kkw/G71Dq,2-3

Attachment

cc Division File  
Northern Region  
Gerald Steele  
Mike Grant  
Charles Worthrup  
Deanne Virgin  
Dana Curtiss



Attachment A

1. Pursuant to 35 Ill. Adm. Code 703.153 any person who owns or operates an "existing HWM facility" or a facility in existence on the effective date of statutory or regulatory amendments which render the facility subject to the requirements to have a RCRA permit shall have interim status and shall be treated as having been issued a permit to the extent he or she has:
  - 1) Complied with the requirements of Section 3010(a) of the Resource Conservation and Recovery Act pertaining to notification of hazardous waste activity;
  - 2) Complied with the requirements of Sections 703.150 and 703.152 governing submission of Part A applications.

You are in apparent violation of 703.153 in that a Part A application has not been filed for your storage site.

2. Pursuant to 35 Ill. Adm. Code 725.111, every facility owner or operator must apply to USEPA for a USEPA identification number in accordance with the USEPA notification procedures (45 FR 12740). You are in apparent violation of this Section in that you have not applied for a USEPA identification number for your facility as a storage site.
3. Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator shall inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing -- or may lead to -- the conditions listed below. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
  1. Release of hazardous waste constituents to the environment or
  2. A threat to human health.

You are in apparent violation of 35 Ill. Adm. Code 725.115(a) for the following reason(s): Inspections of the facility other than the drum holding area are not conducted.

4. Pursuant to 35 Ill. Adm. Code 725.115 (b):
  1. The owner or operator shall develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards.
  2. The owner or operator shall keep this schedule at the facility.
  3. The schedule must identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).



Page 2

4. The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum, the inspection schedule must include the items and frequencies called for in Sections 725.274, 725.293, 725.295, 725.326, 725.447, 725.477 and 725.603.

You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reason(s): The schedule does not include areas other than the drum holding area. Spills were observed which were not noted on any of the inspection forms.

5. Pursuant to 35 Ill. Adm. Code 725.115(c), the owner or operator shall remedy any deterioration or malfunction of equipment or structure which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

You are in apparent violation of 35 Ill. Adm. Code 725.115(c) for the following reason(s): Spills and releases were observed which were not being responded to.

6. Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator shall record inspections in an inspection log or summary. The owner or operator shall keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

You are in apparent violation of 35 Ill. Adm. Code 725.115(d) for the following reason(s): Your inspection records do not include the waste pile area, or reflect spills and releases observed during the inspection.

7. Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reason(s): Spills and releases were observed at the drip track, the waste pile, and the drum holding area.
8. Pursuant to 35 Ill. Adm. Code 725.135, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency. You are in apparent violation of this Section because adequate aisle space was not maintained on the date of the inspection.



Page 3

9. Pursuant to 35 Ill. Adm. Code 725.151(b) the provisions of the contingency plan must be carried out immediately. Whenever there is a fire, explosion or release of hazardous waste contaminants. You are in apparent violation of 35 Ill. Adm. Code 725.151(b) in that releases were observed at the waste pile and in drum holding with no actions being taken.
10. Pursuant to 35 Ill. Adm. Code 725.156, the emergency coordinator must implement specific emergency procedures in an emergency. You are in apparent violation of 35 Ill. Adm. Code 725.156 for the following reason(s): Spills and releases were observed which were not and had not been responded to.
11. Pursuant to 35 Ill. Adm. Code 725.173:
  - a. The owner or operator shall keep a written operating record at the facility.
  - b. The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility.
    1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix A;
    2. The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities this information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest.  
  
(Board Note: See Sections 725.219, 725.379 and 725.409 for related requirements.)
    3. Records and results of waste analysis and trial tests performed as specified in Sections 725.113, 725.300, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502;
    4. Summary reports and details of all incidents that require implementing the contingency plan as specified in Section 725.155(j);
    5. Records and results of inspections as required by Sections 725.115(d) (except these data need be kept only three years);
    6. Monitoring, testing or analytical data where required by Sections 725.190, 725.194, 725.291, 725.293, 725.295, 725.370, 725.378, 725.380(d)(1), 725.447 and 725.477; and



Page 4

(Board Note: As required by Section 725.194, monitoring data at disposal facilities must be kept throughout the post-closure period.)

7. All closure cost estimates under Section 725.242 and, for disposal facilities, all post-closure cost estimates under Section 725.244.

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason(s): Failure to keep an operating record for the waste pile as specified above.

12. Pursuant to 35 Ill. Adm. Code 725.177 the owner or operator must submit reports to the Agency concerning releases, fires, or explosions as requires by 725.196(j). You are in apparent violation of 35 Ill. Adm. Code 725.177 for the following reason: Reports of releases have not been submitted.
13. Pursuant to 35 Ill. Adm. Code 725.212(a), the owner or operator of a hazardous waste management facility shall have a written closure plan. Until final closure is completed and certified in accordance with Section 725.215, a copy of the most current plan must be furnished to the Agency upon request including request by mail. In addition, for facilities without approved plans, it must also be provided during site inspections on the day of inspection to any officer, employee or representative of the Agency.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason(s): You do not have a written closure plan covering the waste pile.

14. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator shall have a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in Sections 725.211 through 725.215 and applicable closure requirements of Sections 725.257, 725.328, 725.358, 725.360, 725.410, 725.461, 725.461 and 725.504.
  1. The estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan (see Section 725.212(b)), and
  2. The closure cost estimate must be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of "parent corporation" in Section 725.241(d).) The owner or operator may use costs for on-site disposal if the owner or operator can demonstrate that on-site disposal capacity will exist at all times over the life of the facility.



Page 6

3. The closure cost estimate must not incorporate any salvage value that may be realized by the sale of hazardous wastes, facility structures or equipment, land or other facility assets at the time of partial or final closure.

4. The owner or operator shall not incorporate a zero cost for hazardous waste which may have economic value.

You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason(s): This requirement has not been met for the waste pile.

15. Pursuant to 35 Ill. Adm. Code 725.353(a), if leachate or runoff from a pile is a hazardous waste, then either:

1. The pile must be placed on an impermeable base that is compatible with the waste under the conditions of treatment or storage;

2. The owner or operator must design, construct, operate and maintain a run-on control system capable of preventing flow onto the active portion of the pile during peak discharge from at least a 25-year storm;

3. The owner or operator must design, construct, operate and maintain a run-off management system to collect and control at least the water volume resulting from a 24-hour, 25-year storm; and

4. Collection and holding facilities (e.g., tanks or basins) associated with run-on and run-off control systems must be emptied or otherwise managed expeditiously to maintain design capacity of the system.

You are in apparent violation of 35 Ill. Adm. Code 725.263(a) for the following reason(s): These minimal technical requirements have not been met for your waste pile.

16. Pursuant to 35 Ill. Adm. Code 725.353(b), if leachate or runoff from a pile is a hazardous waste, then either:

1. The pile must be protected from precipitation and run-on by some other means, and

2. No liquids or wastes containing free liquids may be placed in the pile.

Board Note: If collected leachate or runoff is discharged through a point source to waters of the United States, it is subject to the requirements of Section 12 of the Illinois Environmental Protection Act, as amended.

You are in apparent violation of 35 Ill. Adm. Code 725.353(b) for the following reason(s): Wastes containing free liquids have been placed in the waste pile.



Page C

17. Pursuant to 35 Ill. Adm. Code 725.354, the owner or operator of a waste pile is subject to the requirements for liners and leachate collection systems or equivalent protection provided in 35 Ill. Adm. Code 724.351, with respect to each new unit, replacement of an existing unit, or lateral expansion of an existing unit that is within the area identified in the Part A permit application, and with respect to waste received beginning May 8, 1985. These minimum technical requirements have not been met for the waste pile.

DV:kkw/3719q,4-9





**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Perma-Treat of Illinois  
Attn: Ms. Carolyn Bond  
Industrial Park Drive  
Marion, Illinois 62959

4a. Article Number

P 681 209 708

4b. Service Type

☐ Registered

☐ Insured

☒ Certified

☐ COD

☐ Express Mail

☐ Return Receipt for Merchandise

7. Date of Delivery

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

PS Form 3811, November 1990 ☆ U.S. GPO: 1991-287-066

**DOMESTIC RETURN RECEIPT**

P 681 209 708



### Certified Mail Receipt

No Insurance Coverage Provided

Do not use for International Mail

(See Reverse)

Perma-Treat of Illinois  
Attn: Ms. Carolyn Bond  
Industrial Park Drive  
Marion, Illinois 62959

Postage	\$ 75
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$12.75
Postmark or Date	

PS Form 3800, June 1990

Thank you for using

*[Handwritten signature]*

Date November 6, 1991

To: Reviewer Name Gerald Steele Region Marion  
Re: Site Name Perma Treat of Illinois Date of Response 10-28-91  
Site No. 199 055 5010 -- William County Date Received 11-5-91  
CIL Date September 19, 1991

STATUS OF VIOLATIONS

Section	Date Reviewed	Resolved	F/U Needed	Send PECL
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
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_____	_____	_____	_____	_____

Information packet for PECL must include all unresolved violations.

Reviewer Signature \_\_\_\_\_

Return to: HWRC Deanne Virgin  
Facilities Compliance Unit  
Land Pollution Control #24

RECEIVED  
- 5 DEC 1991  
IEPA/DLPC

*This submittal does not address any outstanding violations. It was to show intent to comply with Drip test requirements in case cold weather prevents sealant application until after Feb. of 1992*

RECEIVED  
NOV 15 1991  
IL ENVIRONMENTAL PROTECTION AGENCY  
MARION REGIONAL OFFICE

RESPONSE TO 9/19/91 CHL

Brian White

# Perma-Treat Of Illinois, Inc.

CCA Pressure Treated Wood Products

Landscape Ties - Treated Lumber - Mine Products

N. Carbon St. & Industrial Park Dr. • P.O. Box 99 • Marion, Ill. 62959 • (618)997-5646

199 055 5010 -- Williamson Co  
Perma-Treat of Illinois  
ILD 063.698 971  
Compliance

October 28, 1991

RECEIVED

Illinois Environmental Protection Agency  
P O Box 19276  
Springfield IL 62794-9276

NOV 05 1991

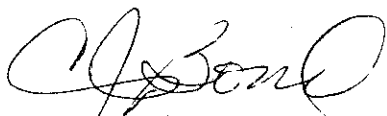
IEPA-DLPC

Dear Sir:

Perma-Treat of Illinois, Inc. is intending to comply with the drip pad standards. Control Process Systems Inc. will be doing the installation of our drip pad. The estimated cost of the installation will be \$19,400.00. The financial arrangement is cash.

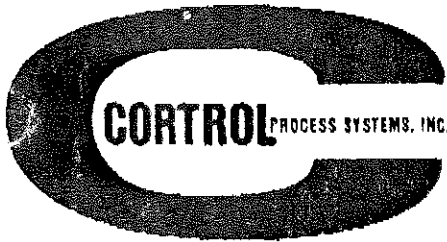
Attached is a copy of Control Process System's letter on the quote. The installation should take place around the first of November, 1990.

Respectfully,



Perma-Treat of Illinois Inc.  
C J Bond

ksd



October 22, 1991

Rudy Bond  
PERMA-TREAT OF ILLINOIS, INC.  
N. Carbon St. & Industrial Park Dr.  
P.O. Box 99  
Marion, IL 62959

Dear Rudy;

Per our conversation of this morning, we are revising our original quotation to an intalled cost of \$19,400.00

The above pricing reflects a deduct in our labor rates, a material profit deduct and the deduct we discussed on the restoration areas.

We can commence work on or about November 4th, providing your area is clean and all the concrete curbing is in place.

Please advise to the construction schedule so we can react accordingly.

Respectfully,

A handwritten signature in cursive script that reads 'Vern Blaylock'.

Vern Blaylock  
CORTROL PROCESS SYSTEMS, INC.

VB/jc

Date 10-22-91

To: Reviewer Name Gerald Steel Region Marion  
Re: Site Name Perma-Treat of Illinois Date of Response 10-18-91  
Site No. 1990555010-- Williamson County Date Received 10-21-91  
CIL Date 9-19-91

STATUS OF VIOLATIONS

Section	Date Reviewed	Resolved	F/U Needed	Send PECL
703.153	10-20-91			X
725.111	10-20-91			X
725.115a	10-20-91			X
725.115b	10-20-91			X
725.115c	12-03-91			X
725.131d4	12-03-91			X
725.135	12-03-91			X
725.151d	12-03-91			X
725.156	12-03-91			X
725.173	12-03-91			X
725.177	12-03-91			X
725.212a	12-03-91			X
725.242a	12-03-91			X
725.353a	12-03-91			X
725.353b	12-03-91			X
725.354	12-03-91			X

Information packet for PECL must include all unresolved violations.

Reviewer Signature Gerald S. Steel  
Return to: HWRC Deanne Virgin  
Facilities Compliance Unit  
Land Pollution Control #24

RECEIVED  
- 5 DEC 1991  
IEPA/DLPC

RECEIVED  
OCT 24 1991  
IL ENVIRONMENTAL PROTECTION AGENCY  
MARION REGIONAL OFFICE

RESPONSE TO 9/19/91 OK.

MOHAN, ALEWELT, PRILLAMAN & ADAMI

LAWYERS

SUITE 325

FIRST OF AMERICA CENTER

1 OLD CAPITOL PLAZA NORTH

SPRINGFIELD, ILLINOIS 62701-1323

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(217) 528-2517

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October 18, 1991

Deanne Virgin  
Compliance Unit  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

Re: 1990555010-Williamson County  
Perma-Treat of Illinois  
ILDO63698971  
Compliance File

RECEIVED

OCT 21 1991

IEPA-DLPC

Dear Ms. Virgin:

This letter is in response to the Compliance Inquiry Letter dated September 19, 1991, directed to our client, Perma-Treat of Illinois. This letter is directed to you at this time pursuant to the instructions in that Compliance Inquiry Letter, as well as pursuant to extensions for the response time discussed between myself and Mr. G. E. Steele, the Agency inspector responsible for this file.

Before addressing the specific apparent violations identified in the Compliance Inquiry Letter, it would be useful to explain our circumstances and position in a narrative fashion. As the inspection report notes, Perma-Treat is in the business of producing treated wood products, using a solution that includes copper, chrome and arsenic. The only hazardous waste from Perma-Treat's operations is that removed from its containment pit<sup>1</sup>; the waste is in the form of mud and bark, and is identified as RCRA D004/D007 wastes. Until the waste is actually physically removed from the pit, it remains an integral part of

<sup>1</sup>Although Mr. Steele's investigation narrative suggests that Perma-Treat has two pits (a "door" pit and a "containment" pit), in actuality only one large containment pit exists, which extends from the cylinder are a through the tank area identified in Mr. Steel's narrative drawing.

Perma-Treat's process, and so is not yet waste. See 35 Ill. Admin. Code §721.102(e)(1)(A) (providing that materials are not solid waste if they can be recycled by being reused as an ingredient in an industrial process).

As is also indicated in the inspection report, Perma-Treat generates approximately 2 drums worth of the waste per month. Each drum weighs approximately 300 to 400 pounds, which would be around 180 kilograms. Accordingly, Perma-Treat generates no more than 350 to 400 kilograms of this hazardous waste per month. At the time of the inspection, Perma-Treat had accumulated on-site approximately 10 drums worth of these wastes, which would weigh no more than 4,000 kilograms.

Upon accumulation of the hazardous waste, Perma-Treat contacts a transporter to remove the waste, which is done at approximately the same rate as the waste is generated -- that is, it is removed at a rate of approximately two drums per month. The waste is taken by Hickson Corporation to its Valparaiso, Indiana facility, and is then taken for ultimate disposal to Emelle, Alabama. Valparaiso, Indiana is located in excess of 200 miles from Perma-Treat's Marion, Illinois location.

Based upon the above facts, it is Perma-Treat's position that it is a small quantity generator subject to the requirements of §722.134(e) of the Pollution Control Board's RCRA regulations, 35 Ill. Admin. Code §722.134(e). Specifically, Perma-Treat generates greater than 100 kilograms but less than 1000 kilograms of the hazardous waste in each calendar month, and must offer that waste for transportation over a distance of 200 miles or more for off-site treatment, storage and disposal. Accordingly, the regulations allow Perma-Treat to accumulate that waste on-site for up to 270 days without a permit and without obtaining interim status, so long as Perma-Treat complies with the requirements of §722.134(d). It is Perma-Treat's further position that it has fully complied with those regulations.

Because Perma-Treat is a small quantity generator, most of the regulations identified in the Compliance Inquiry Letter as having apparently been violated are inapplicable. For instance, §724.550(a) indicates that the waste pile regulations are inapplicable to the extent provided by §725.101, which in turn provides at subsection(c)(7) that those provisions are inapplicable for small quantity short-term accumulating generators, such as Perma-Treat.

Mr. Steele's inspection report, and the Compliance Inquiry Report, nevertheless appear to focus upon the "waste pile" as the primary source of Perma-Treat's apparent violations. That pile consists of accumulated wastes from the pit, and at no time has it held more than 6000 kilograms. Moreover, that pile



Deanne Virgin  
Springfield, IL

October 18, 1991  
Page 3

has been accumulated since about January 7, 1991. Accordingly, as of the June 20, 1991 inspection date, fewer than 270 days had passed during which that waste had been accumulated.

Perma-Treat recognizes that some degree of ambiguity or misunderstanding exists due to the "waste pile." To avoid any such misunderstandings or ambiguities in the future, Perma-Treat intends, without admitting liability, to modify its operations to make explicit the applicability of the small quantity generator accumulation time periods. The remaining materials in the "waste pile" are being removed from Perma-Treat's property through special arrangements with a hazardous waste hauling and disposal firm from northern Indiana. Moreover, Perma-Treat plans to adjust its accumulation time to no more than 90 days on-site, to dispel any question about the legality of the temporary accumulation.

The Compliance Inquiry Letter also appears to be concerned with apparent hazardous waste spills on the ground near the "waste pile." The dirt in question has been excavated, and so the spill has been cleaned up in accordance with §722.134(d)(5)(D)(ii); it, too, is being hauled off-site pursuant to special arrangements. Perma-Treat has had that soil analyzed, and the results indicate that no arsenic or chromium is present in the non-excavated soil. A copy of the chemical report is attached hereto, for your records. Analyses of the disposed-of materials from the disposal contractor will be available to the Agency once Perma-Treat receives a copy, as will be all manifests and other required documentation. Perma-Treat will cooperate fully in allowing or securing whatever additional testing the Agency determines is necessary. Further, Perma-Treat has modified its operations, as set forth above, by eliminating the "waste pile," and also by assuring that treated and drying product is kept well clear of the treatment floor's edge; these modifications should alleviate the possibility of any such spills recurring.

Another focus of both the inspection report and the Compliance Inquiry Letter is the existence of spilled liquids near the wood storage area on the east side of the facility and in the drip track area. Once again, this issue arises apparently through some degree of ambiguity or misunderstanding. It is Perma-Treat's position that these liquids identified during the inspection do not constitute "wastes" in the first instance, and so can not and do not also constitute "hazardous wastes," or "spills." The entire floor area of Perma-Treat's facility, including the two locations identified as harboring "spills," slopes toward the containment pit, with a total 12 to 16 inch slope. The liquids seen by Mr. Steele are still in Perma-Treat's process, inasmuch as they flow into the containment pit for eventual reuse in treating lumber. Section 721.102(e)(1)(A) expressly provides that materials are not solid wastes if they

can be recycled by being reused as ingredients in an industrial process. In turn, §721.103 provides that hazardous wastes are particular forms of solid waste. Since the liquids in question are being reused as ingredients in Perma-Treat's industrial process, they are not "wastes" and consequently are not "spilled" "hazardous wastes," either.

Nevertheless, once again to avoid any future misunderstandings on this point, Perma-Treat agrees to modify its procedures and policies to make unambiguous the fact that these liquids remain in Perma-Treat's process. Specifically, at the end of each working shift (which currently is only once per day), Perma-Treat will sweep all floor surfaces containing any dripped solution to expedite that solution's return to the containment pit.

Based upon and in light of the above considerations, Perma-Treat has the following specific responses to the apparent violations identified in your Compliance Inquiry Letter of September 19, 1991:

(1) §703.153: apparent violation for failing to file a Part A application for interim status under RCRA.

Response: As set forth above, Perma-Treat is a small quantity generator within the meaning of and in full compliance with §722.134(e), which expressly exempts such generators from compliance with the requirements of seeking or obtaining RCRA interim status.

(2) §725.111: apparent violation for failure to have applied for a U.S.E.P.A. identification number for Perma-Treat's facility as a storage site.

Response: Pursuant to §725.110 and §725.101(c)(7), entities such as Perma-Treat which are governed by §722.134(e) are not required to comply with the provisions of §725.111. Moreover, Perma-Treat has fully complied with the requirements of §722.134(d).

(3) §725.115(a): apparent violation for failing to conduct inspections of areas of the facility other than the drum holding area, to identify actual or potential releases or threats to human health.

Response: Pursuant to §725.110 and §725.101(c)(7), the inspections required by §725.115(a) are not required of entities such as Perma-Treat which are governed by §722.134. Moreover, Perma-Treat has fully complied with the requirements of §722.134(d).

(4) §725.115(b): apparent violation for failing to develop and follow a written schedule for inspections of areas other than the drum holding area, and for failure to note spills observed during the inspection on any inspection form.

Response: Pursuant to §725.110 and §725.101(c)(7), the requirements of §725.115(b) are inapplicable to entities such as Perma-Treat which are governed by the requirements of §722.134. Moreover, Perma-Treat has been and is in full compliance with the requirements of §722.134(d).

(5) §725.115(c): apparent violation for failing to take remedial action for spills and releases observed during the inspection.

Response: Pursuant to §725.110 and §725.101(c)(7), the provisions of §725.115(c) do not apply to entities such as Perma-Treat which are governed by §722.134, with which Perma-Treat has been and is in full compliance. Moreover, as set forth above, Perma-Treat contends that no "spills" or "releases" were present at the facility on the day of the inspection, and/or that any such spills have been remediated.

(6) §725.115(d): apparent violation for failing to include the waste pile area, or to reflect spills and releases observed during the inspection, in the facility's inspection log.

Response: Pursuant to §725.110 and §725.101(c)(7), the provisions of §725.115(d) do not apply to entities such as Perma-Treat which are governed by §722.134. Moreover, Perma-Treat is and has been in full compliance with the requirements of §722.134(d).

(7) §725.131: apparent violation for failing to maintain and operate the facility so as to minimize the possibility of non-sudden release of hazardous waste, as evidenced by spills and releases observed at the drip track, the waste [pile], and the drum holding area.

Response: Pursuant to §722.134(d)(4), §725.131 does apply to Perma-Treat and other entities governed by §722.134. Nevertheless, Perma-Treat maintains that no violation of this section has occurred, because no spills of hazardous wastes have occurred, as set forth above, and/or that any such spills have been remediated in accordance with §722.134(d)(5)(D)(ii), and that Perma-Treat has modified its operations to alleviate the possibility of any such spills recurring.

(8) §725.135: apparent violation for failure to maintain adequate aisle space on the date of the inspection.

Response: Perma-Treat is not certain of the intentions with respect to this apparent violation because nothing in the narrative inspection report identifies this deficiency. Nevertheless, Perma-Treat intends to conduct its operations to assure full compliance with §721.135 in the future.

(9) §725.151(d): apparent violation for failure to take action consistent with the facility's contingency plan to remediate observed spills or releases in the waste pile and drum holding areas.

Response: Pursuant to §725.150 and §725.101(c)(7), the provisions of 725.151(b) do not apply to entities such as Perma-Treat which are governed by §722.134. Moreover, as set forth above, Perma-Treat maintains that it has fully complied with the requirements of §722.134(d), and that no "spills" have been or were present on the day of the inspection, and/or that any such spills have been remediated.

(10) §725.156: apparent violation for failure of the emergency coordinator to implement specific emergency procedures in response to observed spills and releases.

Response: Pursuant to §725.150 and §725.101(c)(7), §725.156 does not apply to entities such as Perma-Treat which are governed by §722.134. Moreover, as set forth above, Perma-Treat maintains that it has been and is in full compliance with the requirements of §722.134(d)(5)(D)(ii), and denies that any spill has been or was present on the day of the inspection, and/or that any such spills have been remediated.

(11) §725.173: apparent violation for failing to keep an operating record for the waste pile at the facility.

Response: Pursuant to §725.170 and §725.131(c)(7), the requirements of §725.173 do not apply to entities such as Perma-Treat which are governed by the requirements of §722.134. Moreover, Perma-Treat maintains that it has been and is full compliance with the requirements of §722.134(d).

(12) §725.177: apparent violation for failing to submit reports of release to the Agency.

Response: Pursuant to §725.170 and §725.101(c)(7), the requirements of §725.177 do not apply to entities such as Perma-Treat which are governed by the requirements of §722.134. Moreover, Perma-Treat maintains that it has been and is in full compliance with the requirements of §722.134(d); to the extent this apparent violation concerns the "spills" identified at the

inspection, Perma-Treat also maintains that no such spills existed, and/or that any such spills have been remediated.

(13) §725.212(a): apparent violation for failure to have a written closure plan covering the waste pile.

Response: Pursuant to §725.210 and §725.101(c)(7), §725.212(a) does not apply to entities such as Perma-Treat which are governed by the requirements of §722.134. Moreover,

Perma-Treat maintains that it has been and is in full compliance with the requirements of §722.134(d).

(14) §725.242(a): apparent violation for failing to submit a written estimate of costs of closure for the waste pile.

Response: Pursuant to §725.240(a) and §725.101(c)(7), the requirements of §725.242(a) do not apply to entities such as Perma-Treat which are governed by the requirements of §722.134. Moreover, Perma-Treat maintains that it has been and is in full compliance with the requirements of §722.134(d).

(15) §725.353(a): apparent violation for failure to meet minimum technical requirements for a waste pile from which leachate or runoff is a hazardous waste.

Response: Pursuant to §725.350 and §725.101(c)(7), §725.353 does not apply to entities such as Perma-Treat governed by the requirements of §722.134. Moreover, Perma-Treat maintains that it has been and is in full compliance with the requirements of §722.134(d). Further, Perma-Treat also maintains that any "leachate" or "runoff" from the "waste pile" in question is not a hazardous waste, but is part of its process and is accordingly returned to Perma-Treat's containment pit.

(16) §725.353(b): apparent violation for placing wastes which contain free liquids onto a waste pile from which leachate or runoff is a hazardous waste.

Response: Pursuant to §725.350 and §725.101(c)(7), the provisions of §725.353 do not apply to entities such as Perma-Treat which are governed by §722.134. Moreover, Perma-Treat maintains that it has been and is in full compliance with §722.134(d). Further, Perma-Treat maintains that any "leachate" or "runoff" from the "waste pile" in question is not a hazardous waste, but is part of its process and is accordingly returned to Perma-Treat's containment pit.

Deanne Virgin  
Springfield, IL

October 18, 1991  
Page 8

(17) §725.354: apparent violation for failing to install minimum technical design requirements, such as liners and leachate collection systems, for the waste pile.

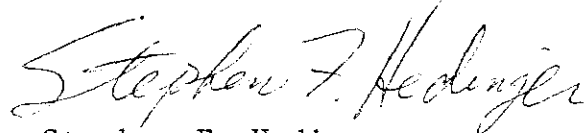
Response: Pursuant to §725.350 and §725.101(c)(7), the provisions of §725.354 do not apply to entities such as Perma-Treat which are governed by the provisions of §722.134. Moreover, Perma-Treat maintains that it has been and is in full compliance with the requirements of §722.134(d).

We trust that this response will satisfy your concerns arising from the Agency's June 20, 1991 inspection of Perma-Treat's facility. In the event further information or discussion is required, though, please feel free to contact the undersigned at your convenience.

Very truly yours,

MOHAN, ALEWELT, PRILLAMAN & ADAMI

By

  
Stephen F. Hedinger

SFH/drm

MOHAN, ALEWELT, PRILLAMAN & ADAMI  
LAWYERS  
SUITE 325

FIRST OF AMERICA CENTER  
1 OLD CAPITOL PLAZA NORTH

SPRINGFIELD, ILLINOIS 62701-1323

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JAMES T. MOHAN, OF COUNSEL

TELEPHONE  
(217) 528-2517  
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(217) 528-2553

October 1, 1991

Bryan S. White, Manager  
Compliance Unit  
Planning and Reporting Section  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Re: 1990555010 -- Williamson County  
Perma-Treat of Illinois  
ILD063698971  
Compliance File

Dear Mr. White:

We are the attorneys for Perma-Treat of Illinois, Inc. Today we were FAX'd a copy of your September 19, 1991 Compliance Inquiry Letter, with the request that we advise the client. We have already made contact with the client, but in order to meet your deadline of submitting a written response within fifteen (15) calendar days of September 19, 1991, it does not appear that we can complete our inquiry in time to meet that deadline, so we would request an extension of ten (10) days, through and including October 14, 1991, to reply.

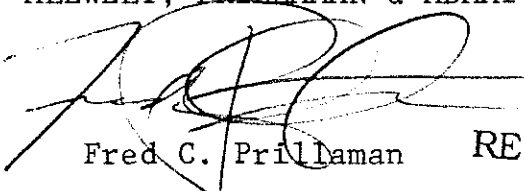
Please be assured that this request is not being made for purposes of delay, but is being requested only so that we might fully apprise ourselves of the facts and circumstances, so that we might prepare a full and complete response by the new deadline.

Thank you in advance for your attention to this request.  
Kindly respond directly to the undersigned.

Very truly yours,

MOHAN, ALEWELT, PRILLAMAN & ADAMI

By

  
Fred C. Prillaman

FCP/sew  
cc: Deanne Virgin  
Gerald Steele  
Perma-Treat of Illinois, Inc.

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OCT 02 1991

IEPA-DLPC

199 055 5010 -Williamson  
Perma-Treat of Illinois  
ILD 063 698 971  
Compliance file





File

217/782-6761

Refer to: 1990555010 -- Williamson County  
Perma-Treat of Illinois  
ILD063698971  
Compliance File

COMPLIANCE INQUIRY LETTER

Certified #P 681 207 928

September 19, 1991

Perma-Treat of Illinois  
Attn: Ms. Carolyn Bond  
Industrial Park Drive  
Marion, Illinois 62959

Dear Ms. Bond:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of generators and storage sites of hazardous waste and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance in Attachment A are based on an inspection completed on June 20, 1991. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Deanne Virgin  
Compliance Unit  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



Page 2

If you have any questions regarding the above, please contact Mr. Gerald Steele at 618/997-4371.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian S. White", written over the word "Sincerely,".

Brian S. White, Manager  
Compliance Unit  
Planning and Reporting Section  
Division of Land Pollution Control

BSW:GS:DV:sf/2827q,12-13

cc: Division File  
Marion Region  
Gerald Steele  
Deanne Virgin



Attachment A

1. Pursuant to 35 Ill. Adm. Code 703.153 any person who owns or operates an "existing HWM facility" or a facility in existence on the effective date of statutory or regulatory amendments which render the facility subject to the requirements to have a RCRA permit shall have interim status and shall be treated as having been issued a permit to the extent he or she has:
  - 1) Complied with the requirements of Section 3010(a) of the Resource Conservation and Recovery Act pertaining to notification of hazardous waste activity;
  - 2) Complied with the requirements of Sections 703.150 and 703.152 governing submission of Part A applications.

You are in apparent violation of 703.153 in that a Part A application has not been filed for your storage site.

2. Pursuant to 35 Ill. Adm. Code 725.111, every facility owner or operator must apply to USEPA for a USEPA identification number in accordance with the USEPA notification procedures (45 FR 12746). You are in apparent violation of this Section in that you have not applied for a USEPA identification number for your facility as a storage site.
3. Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator shall inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing -- or may lead to -- the conditions listed below. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
  - 1) Release of hazardous waste constituents to the environment or
  - 2) A threat to human health.

You are in apparent violation of 35 Ill. Adm. Code 725.115(a) for the following reason: Inspections of the facility other than the drum holding area are not conducted.

4. Pursuant to 35 Ill. Adm. Code 725.115(b):
  - 1) The owner or operator shall develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting or responding to environmental or human health hazards.
  - 2) The owner or operator shall keep this schedule at the facility.
  - 3) The schedule must identify the types of problems (e.g., malfunctions or deterioration) which are to be looked for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, etc.).



- 4) The frequency of inspection may vary for the items on the schedule. However, it should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration or malfunction or any operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use. At a minimum, the inspection schedule must include the items and frequencies called for in Sections 725.274, 725.293, 725.295, 725.326, 725.447, 725.477 and 725.503.

You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reason: The schedule does not include areas other than the drum holding area. Spills were observed which were not noted on any of the inspection forms.

5. Pursuant to 35 Ill. Adm. Code 725.115(c), the owner or operator shall remedy any deterioration or malfunction of equipment or structure which the inspection reveals on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

You are in apparent violation of 35 Ill. Adm. Code 725.115(c) for the following reason: Spills and releases were observed which were not being responded to.

6. Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator shall record inspections in an inspection log or summary. The owner or operator shall keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions.

You are in apparent violation of 35 Ill. Adm. Code 725.115(d) for the following reason: Your inspection records do not include the waste pile area, or reflect spills and releases observed during the inspection.

7. Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reason: Spills and releases were observed at the drip track, the waste pipe, and the drum holding area.
8. Pursuant to 35 Ill. Adm. Code 725.135, the owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of facility operation in an emergency. You are in apparent violation of this Section because adequate aisle space was not maintained on the date of the inspection.



Page 3

9. Pursuant to 35 Ill. Adm. Code 725.151(b) the provisions of the contingency plan must be carried out immediately. Whenever there is a fire, explosion or release of hazardous waste contaminants. You are in apparent violation of 35 Ill. Adm. Code 725.151(b) in that releases were observed at the waste pile and in drum holding with no actions being taken.
10. Pursuant to 35 Ill. Admin. Code 725.156, the emergency coordinator must implement specific emergency procedures in an emergency. You are in apparent violation of 35 Ill. Adm. Code 725.156 for the following reason: Spills and releases were observed which were not and had not been responded to.
11. Pursuant to 35 Ill. Adm. Code 725.173:
  - a. The owner or operator shall keep a written operating record at the facility.
  - b. The following information must be recorded as it becomes available and maintained in the operating record until closure of the facility.
    1. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix A;
    2. The location of each hazardous waste within the facility and the quantity at each location. For disposal facilities the location and quantity of each hazardous waste must be recorded on a map or diagram of each cell or disposal area. For all facilities this information must include cross-references to specific manifest document numbers if the waste was accompanied by a manifest;  
  
(Board Note: See Sections 725.219, 725.379 and 725.409 for related requirements.)
    3. Records and results of waste analysis and trial tests performed as specified in Sections 725.113, 725.300, 725.325, 725.352, 725.373, 725.414, 725.441, 725.475 and 725.502;
    4. Summary reports and details of all incidents that require implementing the contingency plan as specified in Section 725.156(j);
    5. Records and results of inspections as required by Sections 725.115(d) (except these data need be kept only three years);
    6. Monitoring, testing or analytical data where required by Sections 725.190, 725.194, 725.291, 275.293, 725.295, 725.376, 725.378, 725.380(d)(1), 725.447 and 725.477; and



(Board Note: As required by Section 725.194, monitoring data at disposal facilities must be kept throughout the post-closure period.)

7. All closure cost estimates under Section 725.242 and, for disposal facilities, all post-closure cost estimates under Section 725.244.

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reason: Failure to keep an operating record for the waste pile as required above.

12. Pursuant to 35 Ill. Adm. Code 725.177 the owner or operator must submit reports to the Agency concerning releases, fires, or explosions as required by 725.155(j). You are in apparent violation of 35 Ill. Adm. Code 725.177 for the following reason: Reports of releases have not been submitted.

13. Pursuant to 35 Ill. Adm. Code 725.212(a), the owner or operator of a hazardous waste management facility shall have a written closure plan. Until final closure is completed and certified in accordance with Section 725.215, a copy of the most current plan must be furnished to the Agency upon request including request by mail. In addition, for facilities without approved plans, it must also be provided during site inspections on the day of inspection to any officer, employee or representative of the Agency.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason: You do not have a written closure plan covering the waste pile.

14. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator shall have a detailed written estimate, in current dollars, of the cost of closing the facility in accordance with the requirements in Sections 725.211 through 725.215 and applicable closure requirements of Sections 725.297, 725.328, 725.358, 725.380, 725.410, 725.451, 725.481 and 725.504.

- 1) The estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan (see Section 725.212(b)); and
- 2) The closure cost estimate must be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator. (See definition of "parent corporation" in Section 725.241(d).) The owner or operator may use costs for on-site disposal if the owner or operator can demonstrate that on-site disposal capacity will exist at all times over the life of the facility.



Page 5

- 3) The closure cost estimate must not incorporate any salvage value that may be realized by the sale of hazardous wastes, facility structures or equipment, land or other facility assets at the time of partial or final closure.
- 4) The owner or operator shall not incorporate a zero cost for hazardous waste which may have economic value.

You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason: This requirement has not been met for the waste pile.

15. Pursuant to 35 Ill. Adm. Code 725.353(a), if leachate or runoff from a pile is a hazardous waste, then either:

- 1) The pile must be placed on an impermeable base that is compatible with the waste under the conditions of treatment or storage;
- 2) The owner or operator must design, construct, operate and maintain a run-on control system capable of preventing flow onto the active portion of the pile during peak discharge from at least a 25-year storm;
- 3) The owner or operator must design, construct, operate and maintain a run-off management system to collect and control at least the water volume resulting from a 24-hour, 25-year storm; and
- 4) Collection and holding facilities (e.g., tanks or basins) associated with run-on and run-off control systems must be emptied or otherwise managed expeditiously to maintain design capacity of the system.

You are in apparent violation of 35 Ill. Adm. Code 725.353(a) for the following reason: These minimal technical requirements have not been met for your waste pile.

15. Pursuant to 35 Ill. Adm. Code 725.353(b), if leachate or runoff from a pile is a hazardous waste, then either:

- 1) The pile must be protected from precipitation and run-on by some other means; and
- 2) No liquids or wastes containing free liquids may be placed in the pile.

Board Note: If collected leachate or runoff is discharged through a point source to waters of the United States, it is subject to the requirements of Section 12 of the Illinois Environmental Protection Act, as amended.

You are in apparent violation of 35 Ill. Adm. Code 725.353(b) for the following reason: Wastes containing free liquids have been placed in the waste pile.





Page 6

17. Pursuant to 35 Ill. Adm. Code 725.354, the owner or operator of a waste pile is subject to the requirements for liners and leachate collection systems or equivalent protection provided in 35 Ill. Adm. Code 724.351, with respect to each new unit, replacement of an existing unit, or lateral expansion of an existing unit that is within the area identified in the Part A permit application, and with respect to waste received beginning May 8, 1985.

You are in apparent violation of 35 Ill. Adm. Code 725.354 for the following reason: These minimum technical requirements have not been met for the waste pile.

DV:sf/2827q,15-20

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address

2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Perma-Treat of Illinois  
Attn: Ms. Carolyn Bond  
Industrial Park Drive  
Marion, Illinois 62959

4a. Article Number

P 681 207 928

4b. Service Type

☐ Registered

☐ Insured

☒ Certified

☐ COD

☐ Express Mail

☐ Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address Only if requested and fee is paid

5. Signature (Addressee)

6. Signature (Agent)

PS Form 3811, October 1990

☆ U.S. GPO: 1990-273-861

**DOMESTIC RETURN RECEIPT**

P 681 207 928



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Perma-Treat of Illinois  
Attn: Ms. Carolyn Bond  
Industrial Park Drive  
Marion, Illinois 62959

PS Form 3800, June 1990

Postage	\$ 98
Certified Fee	1.00
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom, Date, & Address of Delivery	1.00
TOTAL Postage & Fees	\$ 298
Postmark or Date	

# Perma-Treat Of Illinois, Inc.

CCA Pressure Treated Wood Products

Landscape Ties - Treated Lumber - Mine Products

N. Carbon St. & Industrial Park Dr. • P.O. Box 99 • Marion, Ill. 62959 • (618)997-5646

August 2, 1991

1990555010  
Williamson - G -  
compliance

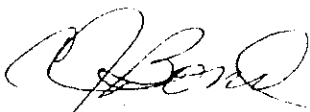
EPA  
Division Land Pollution Control  
2200 Churchhill # 24  
Springfield IL 62706

Gentlemen:

On December 6, 1990 (55 FR 50450) EPA published a final rule listing as hazardous three categories of wastes from wood preserving operations. On June 13, 1991 (56 FR 27332) EPA published an administrative stay of the waste listings which, among other things, conditionally extended the effective date.

In accordance with the stay, we are hereby providing notice that Perma-Treat of Il. Inc. will upgrade their existing drip pad by February 6, 1992. Moreover, Perma-Treat will use its best efforts to minimize drippage that occurs during the duration of the stay.

Sincerely yours,



CAROLYN J BOND  
VICE-PRESIDENT

ksd

RECEIVED

AUG 07 1991

IEPA-DLPC

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

FOS  
Full

Facility: Perma Treat of Illinois  
 U.S. EPA I.D. No. : ILD 063 698971 IEPA # 1990555010  
 Street: Marion Industrial Drive  
 City: Marion State: Ill. Zip: 62959  
 Telephone: \_\_\_\_\_

Owner/Operator:

Street: Scene  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Telephone: \_\_\_\_\_

Inspection Date: 06/10/91 Time: 9:00-11:45aWeather Conditions: Sunny, 80

	Name	Agency/Title	Telephone
Inspectors:	Gerald E. Stolt	IEPA	(618) 997-4321
	Bruce Ford	IEPA	(217) 782-0676
Facility Representative:	C.J. Bond		
	Rudy Bond		

	Generate	Transport	Treat	Store	Dispose
F-Solvent	_____	_____	_____	_____	_____
Dioxin	_____	_____	_____	_____	_____
California List	_____	_____	_____	_____	_____
First Third	_____	_____	_____	_____	_____
Second Third	_____	_____	_____	_____	_____
Third Third	<u>X</u>	<u>1</u>	_____	<u>X</u>	_____

Revised 10-20-89

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11 SEP 1991

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## INSPECTION SUMMARY

### Processes That Generate LDR Wastes

### LDR Waste Management

### Summary

03/13/89  
08 432 10  
10/13/89

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent Yes X No \_\_\_ NA \_\_\_  
(TCLP)\*Dioxin Yes f No \_\_\_ NA \_\_\_  
(TCLP)California List Yes f No \_\_\_ NA \_\_\_  
(PFLT and/or total constituent analysis)\*First & Second Third Yes X No \_\_\_ NA \_\_\_  
(TCLP and/or total constituent analysis)\* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)  
PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes X No \_\_\_ Comments \_\_\_\_\_

- a. What date was the waste analysis plan last revised?
- 
- \_\_\_\_\_

- b. Are analyses conducted on-site or off-site?

\_\_\_ On-site X Off-siteIdentify off-site lab: APC - Mt. Vernon  
\_\_\_\_\_  
\_\_\_\_\_

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes \_\_\_ No \_\_\_ NA X None handled

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes \_\_\_ No \_\_\_

If yes, check the appropriate regulatory status:

\_\_\_ Interim status for storage  
\_\_\_ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

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- B. Does the transporter mix, combine, or recontainerize wastes?

Yes \_\_\_ No \_\_\_

If yes, list the restricted wastes that have been mixed.

---

---

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- C. Is the waste treated in an exempt treatment process on-site?

Yes \_\_\_ No \_\_\_



- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ☐ No ☐ NA ☒

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT\* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☒ No ☐ NA ☐

\* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments \_\_\_\_\_

B. Storage (268.50)

1. Are prohibited wastes\* stored on-site?

Yes ☒ No ☐ (If no, go to C, Treatment.)

\* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit.

☐ Tanks  
☐ Containers  
☒ Other (Identify inappropriate storage unit(s). Waste pile)

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☐ No ☐ NA ☒

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes \_\_\_ No ☒ Charged as 225.173 vol.

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes \_\_\_ No \_\_\_ NA ☒

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes \_\_\_ No \_\_\_ NA ☒

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes \_\_\_ No \_\_\_

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes \_\_\_ No ☒ NA \_\_\_

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, state how: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored: **No**

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes \_\_\_ No \_\_\_ NA ☒

- b. More than one year [268.50(f)]?

Yes \_\_\_ No \_\_\_ NA ☒

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes \_\_\_ No ☒ List\* \_\_\_\_\_

b. Dioxin-containing Wastes

Yes \_\_\_ No ☒ List\* \_\_\_\_\_

c. California List Wastes

Yes \_\_\_ No ☒ List\* \_\_\_\_\_

d. First ~~and~~ Second <sup>Third</sup> Wastes

Yes ☒ No \_\_\_ List\* D004, D007

\* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date -- 11/08/90).

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date -- 11/08/90).

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)  
☐ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
D004, D007	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes \_\_\_ No \_\_\_ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes \_\_\_ No \_\_\_ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes \_\_\_ No ☒ Comments \_\_\_\_\_

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

#### B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes \_\_\_ No \_\_\_

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

\_\_\_\_\_  
\_\_\_\_\_

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes \_\_\_ No \_\_\_

- TCLP Yes ☒ No \_\_\_ NA \_\_\_

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

0004, 0007 - 1-23-89

- Total constituent analysis Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- pH  $\leq 2$  Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which pH testing was used.

\_\_\_\_\_

- Paint Filter Liquid Test Yes \_\_\_ No \_\_\_ NA \_\_\_

List the wastes for which PFLT was used.

\_\_\_\_\_

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☒ No ☒ NA \_\_\_

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No \_\_\_ Comments stored for longer than 90 days in a pile

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

<u>Waste Code</u>	<u>Facilities</u>	<u>Treat/Store</u>
<u>0004, 0007</u>	<u>Emelle Ala</u>	<u>Treat and Store</u>
_____	_____	_____
_____	_____	_____

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☒ No ☐ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

<u>Waste Code</u>	<u>Facility</u>
<u>0004, 0007</u>	<u>Emelle Ala Chem Waste Mgmt</u>
_____	_____
_____	_____



E. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?

Yes ☒ No ☐

Note: Do not include surface impoundments addressed in D, Surface Impoundments.

If yes, specify which units and what wastes each unit has received:

0004-0007 - Waste pile

2. Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure.

Yes ☐ No ☒ NA

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

Yes ☒ No ☐

If yes, at what frequency? Biannual

4. If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity variances) [268.30(a)], does the facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance from treatment standards [268.44]?

Yes ☐ No ☐

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance or the "soft hammer" provisions?

Yes ☒ No ☐ Comments \_\_\_\_\_

If yes, have the minimum technology requirements been met for all units receiving such wastes?

Yes ☐ No ☒ Change as 725 storage vials

6. Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?

Yes \_\_\_ No \_\_\_ NA \_\_\_

7. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

Yes \_\_\_ No \_\_\_ NA \_\_\_

8. Are restricted wastes placed in underground injection wells?

Yes \_\_\_ No \_\_\_ List \_\_\_\_\_

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes \_\_\_ No \_\_\_

- Does notification contain the following?

EPA Hazardous waste number(s) Yes X No \_\_\_

Applicable treatment standards and prohibition levels Yes X No \_\_\_

Manifest number Yes X No \_\_\_

Waste analysis data, if available Yes X No \_\_\_

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes X No \_\_\_

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes \_\_\_ No X (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes \_\_\_ No \_\_\_

- Does the notification contain the following information?

EPA hazardous waste number Yes \_\_\_ No \_\_\_

The corresponding treatment standards and all applicable prohibitions Yes \_\_\_ No \_\_\_

Manifest number Yes \_\_\_ No \_\_\_

Waste analysis data, if available Yes \_\_\_ No \_\_\_

Date the waste is subject to the prohibitions Yes \_\_\_ No \_\_\_

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes \_\_\_ No X If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes	___	No	___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes	___	No	___
(iii)	Manifest number	Yes	___	No	___
(iv)	Waste analysis data, if available	Yes	___	No	___

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes \_\_\_ No \_\_\_

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes \_\_\_ No \_\_\_

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes \_\_\_ No \_\_\_

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes \_\_\_ No \_\_\_

- d. Does the demonstration contain the following information?

A list of facilities and facility  
officials contacted?

Yes \_\_\_ No \_\_\_

Addresses

Yes \_\_\_ No \_\_\_

Telephone numbers

Yes \_\_\_ No \_\_\_

Contact dates

Yes \_\_\_ No \_\_\_

Certification statement

Yes \_\_\_ No \_\_\_

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes \_\_\_ No \_\_\_

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes \_\_\_ No \_\_\_

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes \_\_\_ No \_\_\_ NA \_\_\_

#### 4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No \_\_\_ Comments \_\_\_\_\_

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes \_\_\_ No \_\_\_ NA ☒ Comments \_\_\_\_\_

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes \_\_\_ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes \_\_\_ No \_\_\_ Comments \_\_\_\_\_

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes \_\_\_ No \_\_\_ NA \_\_\_ Comments \_\_\_\_\_

If yes, the TSD checklist must be completed.

# RCRA INSPECTION REPORT

**TYPE OF FACILITY****TYPE OF INSPECTION**

### ***NON-REGULATED STATUS***

## PART A

**PART B PERMIT APPLICATION**

## ENFORCEMENT

## ORDERS ISSUED

**TSD FACILITY ACTIVITY SUMMARY**

IL 582-1834  
LPC-384 (12/89) Page 1

EPA/DLPC





**OPERATOR**

**PERSON(S) INTERVIEWED**

**TITLE**

**PHONE #**

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

**PREPARED BY**

**AGENCY/TITLE****PHONE #**

## SUMMARY OF APPARENT VIOLATIONS

[illegible]



**OWNER****OPERATOR**

Name <i>Perma-Treat of Illinois</i>	Name <i>Same</i>
Address	Address
City <i>Marion</i>	City
State <i>Illinois</i> Zip <i>62959</i>	State Zip
Phone # <i>(618) 997-5646</i>	Phone #

**PERSON(S) INTERVIEWED****TITLE****PHONE #**

<i>Mr. Rudy Bond</i>		<i>(618) 997-5646</i>
<i>Ms. Carolyn Bond</i>		<i>" " "</i>
<i>Mr. Chris Edmonds</i>		<i>" " "</i>

**INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

<i>Mr. Gerald Steele</i>	<i>IEPA / LPC-FOS</i>	<i>(618) 997-4371</i>
<i>Mr. Bruce Ford</i>	<i>IEPA / LPC-RPMS</i>	<i>(217) 782-6761</i>

**PREPARED BY****AGENCY/TITLE****PHONE #**

<i>Gerald S Steele</i>	<i>IEPA / LPC-FOS</i>	<i>(618) 997-4371</i>
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**SUMMARY OF APPARENT VIOLATIONS**

Area	Class	Section
<i>OTH</i>	<i>I</i>	<i>703.153</i>
<i>OTH</i>	<i>I</i>	<i>725.111</i>
<i>OTH</i>	<i>II</i>	<i>725.115a</i>
<i>OTH</i>	<i>II</i>	<i>725.115b</i>
<i>OTH</i>	<i>II</i>	<i>725.115c</i>
<i>OTH</i>	<i>II</i>	<i>725.115d</i>
<i>OTH</i>	<i>I</i>	<i>725.131</i>
<i>OTH</i>	<i>I</i>	<i>725.135</i>
<i>OTH</i>	<i>I</i>	<i>725.151b</i>
<i>OTH</i>	<i>I</i>	<i>725.156</i>
<i>OTH</i>	<i>II</i>	<i>725.177</i>
<i>C/PC</i>	<i>I</i>	<i>725.212a</i>
<i>FIN</i>	<i>I</i>	<i>725.242a</i>

Area	Class	Section
<i>OTH</i>	<i>I</i>	<i>725.353a</i>
<i>OTH</i>	<i>I</i>	<i>725.353b</i>
<i>OTH</i>	<i>I</i>	<i>725.354</i>
<i>OTH</i>	<i>II</i>	<i>725.173</i>

Area	Class	Section

Facility Name: Berna-Trest of Illinois  
USEPA #: IL 2063698971  
IEPA #: 1798580008

[illegible]

★ All "NO" responses must be explained in narrative.



Date : June 20, 1991  
To : Land Division File  
From : G.E.Steele DLPC/FOS Reg.7  
Subject : 1998580008 - Williamson Co.  
Perma-Treat of Illinois  
ILD063698971 FOS

An Annual ISS Inspection of the Perma-Treat wood preserving plant in Marion was conducted on June 20, 1991 by this author. I was accompanied by Mr. Bruce Ford, DLPC/RPMS, who was conducting a site visit in conjunction with HRS scoring. We met with Mr. Rudy Bond, Ms. Carolyn Bond, and Mr. Chris Edmonds of Perma-Treat. This plant treats lumber with a 1.2 % CCA (Copper, Chrome, & Arsenic) solution. Their only hazardous waste is sump mud and bark contaminated with CCA. The last analysis shows this to be a D004/D007 waste. The product tanks, treatment cylinders, drip track, and wet wood holding area are all concreted and under a roof. The concrete was built to slope toward the door pit and product tank containment. Treatment fluids and precipitation are allowed to drain into the containment. They are then pumped into a tank and used as mix water for the CCA. The waste comes from shoveling out the mud and bark that collects in the door pit and the containment pit. No berming is provided around the concrete pad.

They stated that they generate only two drums per month of this waste. The waste is handled by Hickson Corp. of Valparaiso, IN. They ultimately dispose of the material at the Chem. Waste Mgt. site at Emelle, AL. after treatment. They stated that they only generate roughly two drums of this waste a month (825 gals./yr.). They reported that there were only two drums of waste on site, and Hickson was expected that day or the next. They said that their strategy is to only clean out enough mud to make the two drum shipment. The waste must sit to de-water, as Hickson will not pick it up if it contains free liquids.

They have a RCRA Manual prepared by their corporate office that covers the regulations and plans in a general way. They have a separate manual which contains the information specific to this plant. A copy of their contingency plan is posted on bulletin boards in the office and the treatment control room. They have monthly training sessions on a variety of topics, including the RCRA refresher course. A telephone is available in the treatment control room, which is within 50 feet of the cylinders. The operating record shows that the waste was last analyzed on 1-23-89. The last shipment was made to Hickson on 11-09-90. The current drums on site were filled on 06-12-91.

A tour of the facility was taken. A bright green liquid was seen on the drip track area. This is their CCA solution. It had been tracked over about a 10 yd X 10 yd area on the pad,

including near the outer edge. The drum accumulation area is just east of the treatment area. Two properly labeled open topped drums were sitting on pallets. The lids were on the drums, but the retaining rings had not been installed. Mr. Bond said this was to allow evaporation of the liquid and to let the driver see they were dry. Both drums were completely dry. A 06-12-91 accumulation start date was marked on the drums. A puddle of the CCA solution was seen under and near the drums. This release was not being responded to nor shown on the operating record (725.115, 725.131, 725.151, 725.156, 725.177). Mr. Bond said this wasn't a spill, it was the result of their production process. It would either eventually flow to the pit or evaporate. He didn't see why it needed responding to. I pointed out that irregardless of how it got there, this was still an unconfined hazardous waste. It wasn't yet in the recycling loop, as it was still just sitting there. I recommended sweeping or washing puddles like the two observed into the pit where they would be contained inside their recycling loop.

During the tour, we went to the southeast corner of the production area. Here we observed a pile of dirt, bark, and other debris. Treated lumber was stacked north and west of this pile. It was near the edges of the raised concrete pad on the south and east sides (725.135). Mr. Bond identified this as sump mud cleaned from the containment area. He explained that at the first of each year when business is slow, they completely shovel out the diked area. The waste is placed out here to dry. This exceeded the 90 days allowed for accumulation, making Perma-Treat a storage site (703.153, 725.111). A metal mesh supported by pallets was seen under the waste. Green discoloration and salt like deposits were seen on the walls of concrete down to soil. Light green discoloration was seen in the soil along the walls. Indications of flow led to a depression just north east of the pile. A slight light green discoloration was seen here. The waste pile measured about 6 yds X 6 yds. (725.115, 725.131, 725.151, 725.156, 725.177). The waste seen in the drums had been removed from the pile on 06-12-91, not from the pit. The whole area is under a roof, but contains no provision for run-on, run-off or leachate control (725.353, 725.354). The waste pile is not mentioned in any of their RCRA documentation (725.173, 725.212, 725.242). Rapid removal of the wastes currently in holding was discussed, as well as removal of contamination. Possibilities of a totally enclosed treatment system (filter unit) as a replacement were also discussed.

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

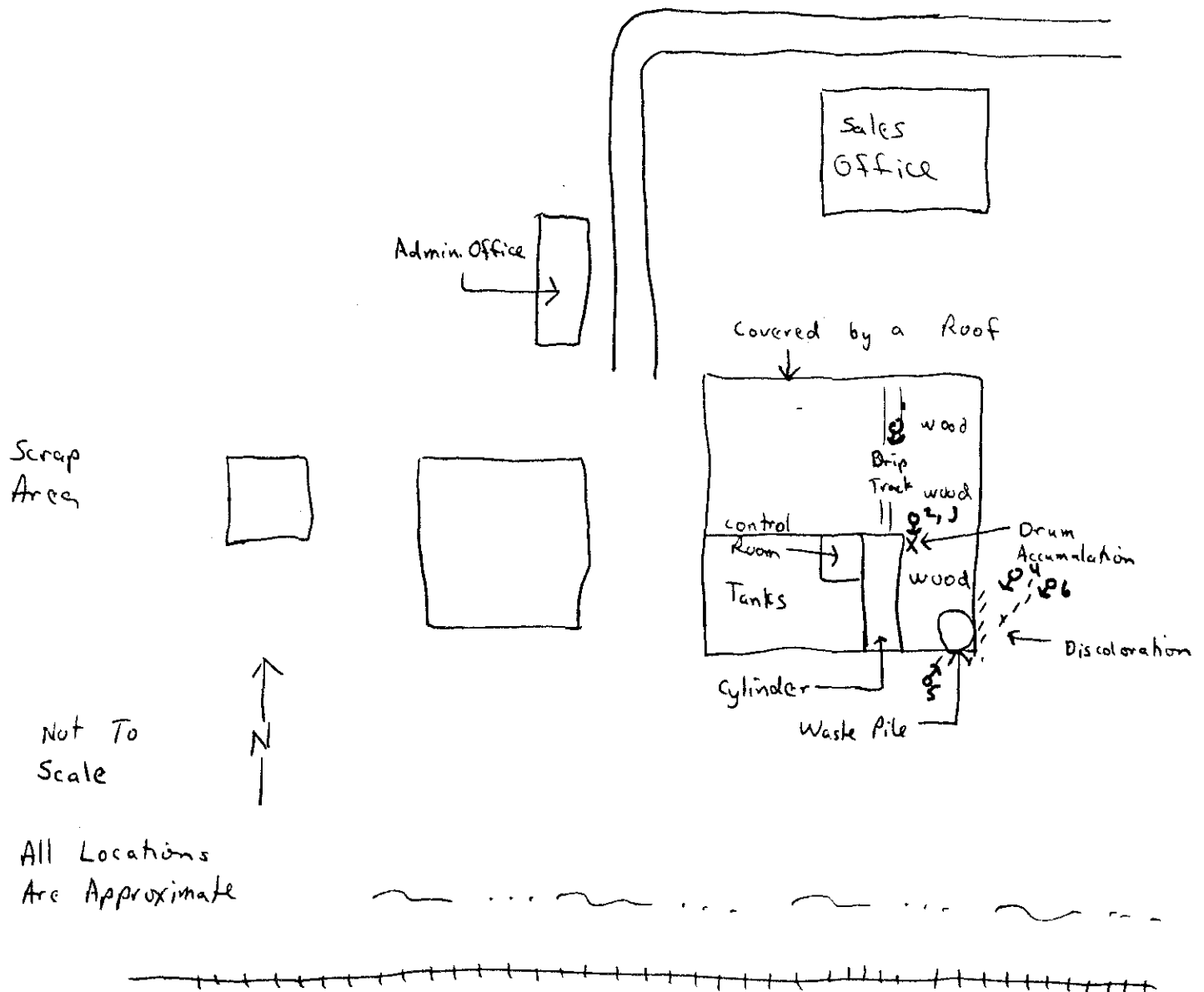
IL 532-0357  
ADM 39  
054-002

Subject 1990555010 - Williamson G.

Date Perma-Treat of Illinois

Reviewed by ILD 063698971

Date June 20, 1991



Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart A: General</b>  <b>Section 722.111: Hazardous Waste Determination</b>  Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				<b>Section 722.112: USEPA Identification Number</b>  Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1		a					
			c					

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10 SEP 1991

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Area	Class	90 Day F.U. Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
MAN	2		a	<b>Section 722.121: Acquisition of Manifests</b>  Did the generator use the manifest supplied by the Agency for hazardous waste going for treatment, storage or disposal in Illinois? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
				For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest supplied by the Agency if the State to which the hazardous waste is being shipped does not supply and require the completion of its own State manifest?  or  For hazardous waste going outside Illinois for treatment, storage or disposal, has the generator used the manifest required by the State to which the hazardous waste is being shipped? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
MAN	2			<b>Section 722.122: Number of Copies</b>  Does the manifest the generator is using consist of at least six copies (plus one copy for each additional transporter)?	<input checked="" type="checkbox"/>			
MAN	2			<b>Section 722.123: Use of the Manifest</b>  For each manifest received, has the generator:  1) Signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  2) Obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p>				
			b	Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			c	Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			d	Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
								Water and rail not used

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
OTH	1	X			<b>PART 722</b> <b>GENERATOR STANDARDS</b> <b>Subpart C: Pre-Transport Requirements</b> <b>Section 722.130: Packaging</b> Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?	X			
OTH	1	X			<b>Section 722.131: Labeling</b> Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?	X			
OTH	1	X			<b>Section 722.132: Marking</b> Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes <u>X</u> No <u>    </u> Is each package of hazardous waste which is ready for transportation off-site marked with: a - The generator's name and address? Yes <u>X</u> No <u>    </u> b - The manifest document number associated with the container? Yes <u>X</u> No <u>    </u> - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes <u>X</u> No <u>    </u>	X			

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
OTH	1				<p><b>Section 722.133: Placarding</b></p> <p>Does the generator have, for the waste it generates, the proper placards to:</p> <ul style="list-style-type: none"> <li>- Placard the transport vehicle, or</li> <li>- Offer to the first transporter, according to 49 CFR, Part 172, Subpart F?</li> </ul> <p><b>NOTE:</b> If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.</p>				<p>Provided by Transporter</p>
OTH	1	X			<p><b>Section 722.134: Accumulation Time</b></p> <p><b>NOTE:</b> If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist.</p> <p><b>NOTE:</b> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p> <p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I: Use and Management of Containers listed below:</p> <p><b>NOTE:</b> If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.</p>		X		<p>Waste is held in a waste pile and in drums.</p> <p>The waste pile has exceeded 90 day holding</p>

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1	X		<p><b>Section 722.134: Accumulation Time</b></p> <p><b>NOTE:</b> A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.</p> <p>For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I?</p> <p>a1 <u>Yes</u> <input checked="" type="checkbox"/> <u>No</u> <input type="checkbox"/></p> <p><b>and/or</b></p> <p>For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300?</p> <p><u>Yes</u> <input checked="" type="checkbox"/> <u>No</u> <input type="checkbox"/></p> <p>a2 For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p><u>Yes</u> <input type="checkbox"/> <u>No</u> <input checked="" type="checkbox"/> <u>N/A</u> <input type="checkbox"/></p> <p>a3 For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p><u>Yes</u> <input checked="" type="checkbox"/> <u>No</u> <input type="checkbox"/></p> <p>a4 Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116?</p> <p><u>Yes</u> <input type="checkbox"/> <u>No</u> <input checked="" type="checkbox"/></p>			See 725	<p>The drums are labeled with the date the drums were sealed. The waste is stored in a waste pile prior to being drummed. Thus, the date only reflects the transfer date, and not the accumulation date.</p> <p>Violations of Subparts C, D, and 725.116 are detailed in the TSD Check List</p>

GEN-C-2(a)

Area	Class	90 Day F U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No
						Yes	No	
					<p><b>Condition of Containers (Section 725.271)</b></p> <p>Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part?            Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Compatibility of Waste with Container (Section 725.272)</b></p> <p>Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>Management of Containers (Section 725.273)</b></p> <p>Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking?            Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>Inspections (Section 725.274)</b></p> <p>Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p>			containers were in good condition

Area	Class	90 Day F U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
					<p><b>Special Requirements for Ignitable or Reactive Wastes (Section 725.276)</b></p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Special Requirements for Incompatible Wastes (Section 725.277)</b></p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				



Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance? Yes No	Not Applicable	Remarks or Comment No.
			c1	<p><b>SATELLITE ACCUMULATION</b></p> <p>Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> <li>- Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 I11. Adm. Code 721.133)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- Complying with the requirements of: <ul style="list-style-type: none"> <li>1) 35 I11. Adm. Code 725.271, Condition of Containers? Yes <input type="checkbox"/> No <input type="checkbox"/></li> <li>2) 35 I11. Adm. Code 725.272, Compatibility of Waste with Containers? Yes <input type="checkbox"/> No <input type="checkbox"/></li> <li>3) 35 I11. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes <input type="checkbox"/> No <input type="checkbox"/></li> <li>- Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes <input type="checkbox"/> No <input type="checkbox"/></li> </ul> </li> </ul>			No Satellite Accumulation used

Area	Class	90 Day F U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No.
						Yes	No	
			c2		<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days?  Yes _____ No _____</p> <p>Are the containers with the excess amounts marked with the date accumulation began?  Yes _____ No _____</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)?  Yes _____ No _____</p>			

GEN-C-27

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	2				<b>PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting</b>  <b>Section 722.140: Recordkeeping</b>  Has the generator retained for a period of three years:	X		None yet needed	
		a		- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
		b		- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>					
		b		- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>					
		c		- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
			d		Does a generator who is involved in any unresolved enforcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			None requested	
			d		If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	2			<p><b>Section 722.141: Annual Reporting</b></p> <p>Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year?</p> <p><b>NOTE:</b> A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.</p>	X			
MAN	1		a	<p><b>Section 722.142: Exception Reporting</b></p> <p>Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste?</p> <p>Yes ___ No ___</p>			X	None yet needed
			b	<p>Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director?</p> <p>Yes ___ No ___</p>				
			b	<p>Does any exception report submitted to the Director contain the following:</p> <p>- A legible copy of the manifest for which the generator does not have confirmation of delivery; and</p>				

GEN-D-2

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts?  Yes ___ No ___ N/A ___</p> <p><b>Section 722.143: Additional Reporting</b></p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				None required

GEN-D-3

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
OTH	1/2				<p><b>PART 722</b>  <b>GENERATOR STANDARDS</b>  <b>Subpart E: Exports of Hazardous Waste</b></p> <p><b>Section 722.152: General Requirements</b></p> <p>Has the facility made any shipments of hazardous waste outside the United States?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> If "No", skip Subpart E. If "Yes", answer the next question.</p> <p>Has the generator complied with the requirements in Sections 722.152 through 722.157?  Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> If the answer is "No", explain in detail why the firm did not meet the requirements. Review the requirements prior to answering this question. When citing a violation of this Subpart, identify the specific section violated in the Narrative as well as in the Comments.</p>				

GEN-E-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No	
MAN	1			<p><b>PART 722</b>  <b>GENERATOR STANDARDS</b>  <b>Subpart F: Imports of Hazardous Waste</b></p> <p><b>Section 722.160: Imports of Hazardous Waste</b></p> <p>Has the person importing hazardous waste met the manifest requirements of Section 722.120 except that:</p> <p>In place of the generator's name, address and USEPA identification number, the name and address of the foreign generator and the importer's name, address and USEPA identification number are used;</p> <p>and</p> <p>Has the importer or his agent signed the manifest in place of the generator;</p> <p>and</p> <p>Has the importer or his agent obtained the signature of the initial transporter?  Yes ___ No ___ N/A ___</p> <p>Is the person importing hazardous waste using manifests obtained from the Agency?  Yes ___ No ___</p>			
			b1				
			b2				
			b2				
			c				

GEN-F-1

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	2	X		<p><b>PART 722 GENERATOR STANDARDS Subpart G: Farmers</b></p> <p><b>Section 722.170: Farmers</b></p> <p>Is a farmer who is disposing of waste pesticides from his own use which are hazardous wastes:</p> <ul style="list-style-type: none"> <li>- Triple rinsing each emptied pesticide container in accordance with 35 Ill. Adm. Code 727.107(b)(3), Residues of Hazardous Waste in Empty Containers? Yes ___ No ___ N/A ___</li> <li>- Disposing of pesticide residue on his own farm in a manner consistent with the disposal instructions on the pesticide label? Yes ___ No ___ N/A ___</li> </ul> <p><b>NOTE:</b> If the answer to either of the preceding questions is "No", the farmer is subject to the requirements of this Part (722) and to the applicable portions of 35 Ill. Adm. Code 702, 703 and 725 (724). Complete the applicable inspection form(s).</p>				

GEN-G-1



Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1		a	<b>PART 703</b> <b>RCRA PERMIT PROGRAM</b> <b>Subpart B: Prohibitions</b>  <b>Section 703.121: RCRA Permits</b>  Is any person(s) conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				<del>703.153</del> will be alleged  No permit.
				1) With a RCRA permit for the HWM facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
				2) In conformance with all conditions imposed by the RCRA permit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>				
			b	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>NA</b> <input checked="" type="checkbox"/>				
			b	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982 have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
0TH	1			a	<p><b>PART 703</b>  <b>RCRA PERMIT PROGRAM</b>  <b>Subpart C: Authorization by Rule and Interim Status</b></p> <p><b>Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications</b></p> <p>Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:</p> <p>1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725?  Yes ___ No ___ N/A ___</p> <p>2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725?  Yes ___ No ___ N/A ___</p> <p>3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site?  Yes ___ No ___ N/A ___</p>				<i>New Facility</i>

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1				<p><b>Section 703.151: Application by New HWM Facilities</b></p> <p>For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Is the facility only operating with a RCRA permit?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE:</b> This violation should be cited in the CIL only after receiving approval from headquarters.</p> <p><b>Section 703.152: Amended Part A Application</b></p> <p>Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:</p> <p>1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE:</b> The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>	<input checked="" type="checkbox"/>		<p>Note: This will be more appropriately charged as 703.153 for which there is no entry on the check list.</p> <p>No interim status</p>	
OTH	1							<input checked="" type="checkbox"/>	

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
OTH	1				<b>Section 703.154: Prohibitions During Interim Status</b> During interim status, has the facility refrained from: <ul style="list-style-type: none"> <li>- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ___ No ___</li> <li>- Employing processes not specified in Part A of the permit application? Yes ___ No ___</li> <li>- Exceeding the design capacities specified in Part A of the permit application? Yes ___ No ___</li> </ul>			<i>No interim status</i>	
					a				
					b				
					c				
OTH	1				<b>Section 703.155: Changes During Interim Status</b> <b>NOTE:</b> Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HMM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HMM facility? Yes ___ No ___ N/A ___			<i>No interim status</i>	
					d				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1			<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart B: General Facility Standards</b> <b>Section 725.111: USEPA Identification Number</b> Has the facility obtained a USEPA identification number? <b>Section 725.112: Required Notices</b> Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A <u>X</u>	<u>X</u>			They have a number as a generator only, not as a storage site.
OTH	1		a	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes ___ No ___ N/A <u>X</u>				These situations have not occurred
OTH	1		a1	<b>Section 725.113: General Waste Analysis</b> Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <u>X</u> No ___	<u>X</u>			

TSD-B-1

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No.
						Yes	No	
			a1		Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
			a3		Has the analysis been repeated:  A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>  B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
			a4		Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
			b		Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  <b>NOTE: If "No", skip to 725.114.</b>  Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			

TSD-B-2

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
					<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)?  Yes <u>X</u> No <u>    </u></p> <p>Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters?  Yes <u>X</u> No <u>    </u></p> <p>2) The test methods which will be used to test for those parameters?  Yes <u>X</u> No <u>    </u></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed?  Yes <u>X</u> No <u>    </u></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?  Yes <u>X</u> No <u>    </u></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply?  Yes <u>    </u> No <u>    </u> <u>NA</u> <u>X</u></p>				not an off-site facility.

Area	Class	90 Day F/U Req	Key Ltr	Requirement		In Apparent Compliance?	Not Applicable	Remarks or Comment No.
				Sub	Sec			
				6)	<p>The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.293 (Tanks);</li> <li>- 725.325 (Surface Impoundments);</li> <li>- 725.352 (Waste Piles);</li> <li>- 725.373 (Land Treatment);</li> <li>- 725.414 (Incinerators);</li> <li>- 725.475 (Thermal Treatment);</li> <li>- 725.502 (Chem. Phys. Bio. Treat.)</li> </ul> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>NOTE: Circle the specific waste management methods being employed.</b></p> <p>For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Section 725.114: Security</b></p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>			These conditions have not happened. Only one waste is applied to the pile

TSD-B-4



Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
			b		<p>Does a non-exempt facility have either:</p> <p>1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ___ No <u>X</u></p> <p>OR</p> <p>2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes ___ No ___</p>				
			c		<p>Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <u>X</u> No ___</p> <p><b>NOTE:</b> Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
OTH	2		a		<b>Section 725.115: General Inspection Requirements</b>  Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:  1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <u>    </u> No <u>  X  </u>	<input checked="" type="checkbox"/>		They only do a weekly inspection of the drum site. Spills were seen during the site visit which were not contained on the operating record.	
					Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <u>    </u> No <u>  X  </u>				
					Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <u>    </u> No <u>  X  </u>				
					Is the written schedule at the facility? Yes <u>    </u> No <u>  X  </u>				
					Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <u>    </u> No <u>  X  </u>				
			b4		Does the schedule specify at least the following minimum inspection frequency:  - Daily inspections of areas subject to spills? Yes <u>    </u> No <u>  X  </u>				

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
					<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> <li>- <del>725.274 (Containers);</del></li> <li>- <del>725.294 (Tanks);</del></li> <li>- 725.326 (Surface Impoundments);</li> <li>- 725.447 (Incinerators);</li> <li>- 725.477 (Thermal Treatment);</li> <li>- 725.503 (Chem. Phys. Bio. Treat.)</li> </ul> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE: Circle the applicable section.</b></p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> <li>- The date and time of the inspection? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></li> <li>- The name of the inspector? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></li> </ul>				

TSD-B-7

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	2		a1	<p>- A notation of the observations made? Yes <u>    </u> No <u>X</u></p> <p>- The date and nature of any type of corrective action? Yes <u>    </u> No <u>X</u> N/A <u>    </u></p> <p><b>Section 725.116: Personnel Training</b></p> <p>Does the facility have a training program? Yes <u>X</u> No <u>    </u></p> <p><b>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</b></p> <p>Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <u>X</u> No <u>    </u></p> <p>Is the training program formalized, i.e., written down? Yes <u>X</u> No <u>    </u></p> <p>Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <u>X</u> No <u>    </u></p> <p>Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <u>X</u> No <u>    </u> N/A <u>    </u></p>	<u>X</u>			
			a2					
			a3					

TSD-B-8

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
					<p>B) Key parameters for automatic waste feed cutoff systems?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>C) Communications or alarm systems?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) Response to fire or explosion?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>E) Response to ground water contamination incidents?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>c Has the facility conducted an annual review of the initial training?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>d Are the following documents and records being maintained at the facility:  1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
				<p>2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes</b></p> <p>Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input type="checkbox"/> No <input type="checkbox"/></p>				
OTH	1	X	e				X	These waste types not handled.
			a					
			a					

TSD-B-10

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
			a		Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes <input type="checkbox"/> No <input type="checkbox"/>				
			b		Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:  1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input type="checkbox"/> No <input type="checkbox"/> 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input type="checkbox"/> No <input type="checkbox"/> 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input type="checkbox"/> No <input type="checkbox"/> 4) Damage the structural integrity of the device or facility containing the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> 5) Through other like means threaten human health or the environment? Yes <input type="checkbox"/> No <input type="checkbox"/>				

TSD-B-11

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes No	Not Applicable	Remarks or Comment No.
				<p><b>Section 725.118: Location Standards</b></p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?  Yes <u>    </u> No <u>X</u> N/A <u>    </u></p> <p><b>NOTE:</b> A "Yes" answer is a violation of the location standard.</p>		X	



Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1	X		<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart C: Preparedness and Prevention</b>  <b>Section 725.131: Maintenance and Operation of Facility</b>  Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air; - Soil; or - Surface water,  which would threaten human health or the environment? Yes ___ No <u>X</u>  <b>Section 725.132: Required Equipment</b>  Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:  - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <u>X</u> No ___ N/A ___  - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <u>X</u> No ___ N/A ___	X		Spills were seen at the drum holding area, waste pile, and drip track area	
OTH	1	X	a		X			
			b					

TSD-C-1

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
						Yes	No		
OTH	1	X	C	d	<p>- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <u>X</u> No <u>  </u> N/A <u>  </u></p> <p>- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <u>X</u> No <u>  </u> N/A <u>  </u></p> <p><b>NOTE: Any "N/A" answers must be explained in the Remarks column.</b></p> <p><b>Section 725.133: Testing and Maintenance of Equipment</b></p> <p>Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:</p> <p>- Communications/alarm systems? Yes <u>X</u> No <u>  </u> N/A <u>  </u></p> <p>- Fire protection equipment? Yes <u>X</u> No <u>  </u> N/A <u>  </u></p> <p>- Spill control equipment? Yes <u>X</u> No <u>  </u> N/A <u>  </u></p> <p>- Decontamination equipment? Yes <u>X</u> No <u>  </u> N/A <u>  </u></p> <p><b>NOTE: Any "N/A" answer must be explained in the Comments.</b></p>	X			

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1	X	a	<b>Section 725.134: Access to Communications or Alarm Systems</b>  Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				There was little to no aisle space around the waste pile
				b  If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
OTH	1	X		<b>Section 725.135: Required Aisle Space</b>  Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	X			
OTH	2		a	<b>Section 725.137: Arrangements with Local Authorities</b>  Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	X			

TSD-C-3

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
					<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NDTE: Any "N/A" answer must be explained in the Comments.</b></p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				There have been no refusals.

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
OTH	1		a		<b>PART 725</b> <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b> <b>Subpart D: Contingency Plan and Emergency Procedures</b>  <b>Section 725.151: Purpose and Implementation of Contingency Plan</b>  Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  <b>NOTE: If the answer is "No", skip to 725.155.</b>  Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>  Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Spills were seen near the drum holding area, the drip tracks, and the waste pile  The contingency plan is posted in the office and in the cylinder control room
OTH	2		a		<b>Section 725.152: Content of Contingency Plan</b>  Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to:  1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
					<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <u>X</u> No <u>  </u></p> <p>Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <u>f</u> No <u>  </u></p> <p>2) Hospitals? Yes <u>f</u> No <u>  </u></p> <p>3) Contractors? Yes <u>f</u> No <u>  </u></p> <p>4) State and local emergency response teams? Yes <u>f</u> No <u>  </u></p> <p>Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <u>f</u> No <u>  </u></p> <p>Is the list of emergency coordinators up-to-date? Yes <u>f</u> No <u>  </u></p> <p>If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <u>X</u> No <u>  </u></p> <p>Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <u>X</u> No <u>  </u></p>				

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.				
						Yes	No						
OTH	2				2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>							
					3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								
					Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								
					Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>								
					Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								
					Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								
					<b>Section 725.153: Copies of Contingency Plan</b>								
					Has a copy (and all revisions) of the contingency plan: a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								
					b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No.	
						Yes	No		
OTH	2				<p><b>725.154: Amendment of Contingency Plan</b></p> <p>Has the contingency plan been reviewed and, if necessary, amended whenever:</p> <p>1) Applicable regulations are revised? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>2) The plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) The list of emergency coordinators changes? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>5) The list of emergency equipment changes? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><b>Section 725.155: Emergency Coordinator</b></p> <p>Is there an emergency coordinator on-site or on-call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				The changes have not occurred.
OTH	2								

TSD-D-4



Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes <u>X</u> No <u>    </u></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes <u>X</u> No <u>    </u></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion? Yes <u>X</u> No <u>    </u></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>		<input checked="" type="checkbox"/>		Three releases were observed at the time of the inspection, which were not being responded to.

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
MAN	1				<p><b>PART 725</b></p> <p><b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b></p> <p><b>Subpart E: Manifest System, Recordkeeping and Reporting</b></p> <p><b>Section 725.171: Use of Manifest System</b></p> <p>Does the facility accept waste from off-site?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173.</b></p> <p>For each manifest reviewed, did the facility:</p>				
					a1				1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes <input type="checkbox"/> No <input type="checkbox"/>
					a2				2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
					a3				3) Immediately give one copy of the completed manifest to the transporter? Yes <input type="checkbox"/> No <input type="checkbox"/>
					a4				4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes <input type="checkbox"/> No <input type="checkbox"/>
					a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes <input type="checkbox"/> No <input type="checkbox"/>			

TSD-E-1

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	2				<p><b>Section 725.173: Operating Record</b></p> <p>a Does the owner or operator have a written operating record at the facility? Yes <u>    </u> No <u>X</u></p> <p>b Is the information in the operating record being maintained until closure of the facility? Yes <u>    </u> No <u>X</u></p> <p>b Does the operating record contain the following information:</p> <p>1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <u>    </u> No <u>X</u></p> <p>2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <u>    </u> No <u>X</u></p> <p>3) The location of each hazardous waste within the facility? Yes <u>    </u> No <u>X</u></p> <p>4) The quantity of each hazardous waste at each location within the facility? Yes <u>    </u> No <u>X</u></p> <p>5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <u>    </u> No <u>    </u> N/A <u>X</u></p>				No records of the waste pile cure kept.

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes <u>    </u> No <u>    </u> N/A <u>X</u></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <ul style="list-style-type: none"> <li>- 725.113 (Gen. Waste Analysis)? Yes <u>X</u> No <u>    </u></li> <li>- 725.293 (Tanks)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.325 (Surface Improvements)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.352 (Waste Piles)? Yes <u>    </u> No <u>X</u> N/A <u>    </u></li> <li>- 725.373 (Land Treatment)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.441 (Incinerators)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.475 (Thermal Treatment)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.502 (Chem., Phys., Bio. Treatment)? Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> </ul> <p>B) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes <u>    </u> No <u>X</u> N/A <u>    </u></p>				
								Spills were seen that were not being responded to.

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)?  Yes <u>    </u> No <u>X</u></p> <p><b>NOTE:</b> The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> <li>- 725.190 (G.W. Monitoring)?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.194 (G.W. Monitoring)?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.376 (Land Treatment)?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.378 (Land Treatment)?  Yes <u>    </u> No <u>    </u> N/A <u>    </u> ✓</li> <li>- 735.380(d)(1) (Land Treatment)?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.447 (Incinerators)?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> <li>- 725.477 (Thermal Treatment)?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></li> </ul> <p><b>NOTE:</b> Data required under 725.194 must be kept throughout the post-closure period.</p>				

TSD-E-5

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
OTH	2				<p>11) All closure cost estimates required by Section 725.242?  Yes <u>    </u> No <u>X</u> N/A <u>    </u></p> <p>12) All post-closure cost estimates for disposal facilities required for Section 725.244?  Yes <u>    </u> No <u>X</u> N/A <u>    </u></p> <p><b>Section 725.174: Availability, Retention and Disposition of Records</b></p> <p>During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section?  Yes <u>X</u> No <u>    </u> N/A <u>    </u></p> <p>Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to:</p> <p>- The Agency?  Yes <u>    </u> No <u>    </u></p> <p>- The local land authority?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></p> <p>Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director?  Yes <u>    </u> No <u>    </u> N/A <u>X</u></p>	<u>X</u>		<p>No closure</p> <p>None requested</p>	
		a							
		c							
			b						

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	2			<b>Section 725.175: Annual Report</b> Has the owner or operator prepared and submitted a copy of a facility annual report, supplied by the Agency, to the Agency by March 1 of each year for the preceding calendar year?  <b>Section 725.176: Unmanifested Waste Report</b> Does the facility accept hazardous waste from off-site? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>  <b>NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.177.</b>  Has the facility accepted hazardous waste from an off-site source for treatment, storage or disposal without an accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/>  Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes <input type="checkbox"/> No <input type="checkbox"/>  <b>NOTE: If the answer to both the above questions is "Yes", check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:</b>  Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes <input type="checkbox"/> No <input type="checkbox"/>				Are filing only a generators report. Storage had not yet occurred until after the last report was due
OTH	1							

TSD-E-7

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Ltr	Sub Sec		Yes	No		
OTH	2				<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste?  Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><b>Section 725.177: Additional Reports</b></p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>				
		a		<p>1) Releases, fires, explosions as specified in Section 725.156?  Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>					
		b		<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>					
			c		<p>3) Facility closure as specified in Section 725.215?  Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

TSD-E-8



Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No.
						Yes	No	
CLO	1		a		<p><b>PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements</b></p> <p><b>Section 725.212: Closure Plan</b></p> <p>Was the most current facility closure plan available during the inspection? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Was the closure plan submitted to the Agency within the time frames specified below:</p> <ul style="list-style-type: none"> <li>- At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

The closure plan does not cover the waste pile.

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
CLO	1				<p>- No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>- No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Section 725.218: Post-Closure Plan</b></p> <p>Was the most current facility post-closure plan available during the inspection? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>Section 725.242: Cost Estimate for Closure</b></p> <p>Has the facility prepared a written estimate of the cost of closing the facility?</p> <p><b>Section 725.244: Cost Estimate for Post-Closure Care</b></p> <p>Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?</p> <p><b>NOTE: If no post-closure plan, mark "N/A".</b></p>				Not a disposal unit.
FIN	1						X		
FIN	1							X	

TSD-6/H-2

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
OTH	1	X			<p><b>PART 725</b>  <b>INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES</b>  <b>Subpart L: Waste Piles</b></p> <p><b>Section 725.351: Protection from Wind</b></p> <p>Is the waste pile subject to dispersal by the wind?            Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> If the answer is "Yes", complete the rest of this section. If "No", then check "N/A" and describe why the pile is not subject to wind dispersal in the Remarks.</p> <p>Is the owner or operator:</p> <p>1) Covering the pile to control dispersal?            Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>OR</p> <p>2) Managing the pile by some other means to control dispersal?            Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE:</b> If the answer to 2 is "Yes", explain in detail the "other means" being used to control dispersal.</p> <p><b>Section 725.352: Waste Analysis</b></p> <p>Are the only wastes the facility receives which are amenable to piling compatible with each other?            Yes <input type="checkbox"/> No <input type="checkbox"/></p>	X			Under a roof, 2 sides closed.
OTH	1			a1				X	Only one waste is placed into the pile.

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub	Sec		Yes	No		
			a2		<p>Is the waste received compatible with the waste in the pile to which it will be added?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p><b>NOTE:</b> If the answer to either or both of the above questions is "No", complete the rest of this Section.</p> <p>Does the owner or operator take a representative sample of each incoming movement and analyze it prior to adding the waste to any existing pile?  Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Does the analysis conducted include the visual comparison of color and texture?  Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Is the analysis conducted capable of differentiating between the types of hazardous waste the owner or operator places in the pile so that the mixing of incompatible wastes does not occur?  Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p><b>Section 725.353: Containment</b></p> <p>Is the leachate or runoff from the waste pile a hazardous waste?  Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p><b>NOTE:</b> If the answer is "Yes", complete the rest of this Section. If the answer is "No", check "N/A" and explain why the leachate or runoff is not hazardous waste in the Remarks. If a hazardous waste determination has not been made for leachate runoff from a characteristically hazardous waste pile, 722.111 must be cited.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
OTH	1	X							

TSD-L-2

Area	Class	90 Day F/U Req	Key Ltr	Sub Sec	Requirement	In Apparent Compliance?	Not Applicable	Remarks or Comment No.
						Yes	No	
			a1		Has the owner or operator: 1) Placed the pile on impermeable base that is compatible with the waste under the conditions of treatment or storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			The waste is sitting on a concrete pad.
			a2		2) Designed, constructed and is operating and maintaining a run-on control system capable of preventing flow onto the active portions of the pile during peak discharges from at least a 25 year storm? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			The area is under a roof, but no leaching is provided to prevent run-on
			a3		3) Designed, constructed and is operating and monitoring a runoff management system to collect and control at least the water volume resulting from a 24 hour 25 year storm? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
			a4		4) Emptied or otherwise expeditiously managed the collection and holding facilities associated with run-on and runoff control to maintain design capacity of the system? Yes <input type="checkbox"/> No <input type="checkbox"/> NA			There is noting which will stop the leachate from leaving the waste pile.
			b1		Is the pile protected from precipitation and run-on by some other means? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
			b2		AND Have liquids and wastes containing free liquids been placed in the pile? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			The wastes are placed in the pile so they can dry out prior to drumming

TSD-L-3

Area	Class	90 Day F U Req	Key Ltr.	Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
						Yes	No		
OTH	1				<p><b>Section 725.354: Design Requirements</b></p> <p>Has the owner or operator met the requirements for liners and leachate collection systems or equivalent protection provided in 35 Ill. Adm. Code 724.351 for each new unit, replacement of an existing unit, or lateral expansion of an existing unit that is within the area identified in the facility Part A permit application?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>Did the owner or operator meet the above requirements for waste received after May 8, 1985?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><b>Section 725.356: Special Requirements for Ignitable or Reactive Waste</b></p> <p>Has the addition of ignitable or reactive waste to the pile been such that:</p> <p>1) The resulting waste or mixture no longer meets the definition of ignitable or reactive waste under Section 721.121 or 721.123?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Section 725.117(b) is complied with?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>OR</p> <p>Is the waste managed in such a way that it is protected from any conditions or materials which may cause it to ignite or react?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<input checked="" type="checkbox"/>			
OTH	1							<input checked="" type="checkbox"/>	None handled.

TSD-L-4

Area	Class	90 Day F/U Req	Key Ltr Sub Sec	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	1			<p><b>Section 725.357: Special Requirements for Incompatible Wastes</b></p> <p>Is the owner or operator complying with the requirements concerning the management of incompatible waste or incompatible waste and materials contained in this Section?</p>			<input checked="" type="checkbox"/>	None handled
CLO	1			<p><b>Section 725.358: Closure and Post-Closure Care</b></p> <p><b>NOTE:</b> Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certified closure in accordance with an approved closure plan.</p>			<input checked="" type="checkbox"/>	
			a	<p>Has the owner or operator removed or decontaminated all waste residues, contaminated containment system components, contaminated subsoils and structures and equipment contaminated with waste and leachate?</p> <p>Yes ___ No ___ N/A ___</p>				
			a	<p>Have the materials which have been removed been managed as hazardous waste unless Section 721.103(d) applies?</p> <p>Yes ___ No ___ N/A ___</p>				
			b	<p>Has the owner or operator found that all contaminated subsoils can be practically removed or decontaminated (after making all reasonable efforts to remove or decontaminate them)?</p> <p>Yes ___ No ___</p>				
			b	<p><b>NOTE:</b> If the answer to the above question is "No", complete the following question.</p> <p>Did the owner or operator close the facility and is he performing post-closure care in accordance with the closure requirements that apply to landfills?</p> <p>Yes ___ No ___</p>				

TSD-L-5



DATE: March 25, 1987<sup>1988</sup>  
TO: Land Division File  
FROM: G. E. Steele, DLPC/FOS  
SUBJECT: 1990550010 - Williamson Co.  
Perma-Treat  
ILD063698971 F.O.S. Incident #3796

An investigation of a spill of C.C.A. (Copper-Chrome-Arsenic) wood preservative at the Perma-Treat plant in Marion was conducted on March 25, 1987<sup>1988</sup> by this author. Mr. Rudy Bond of Perma-Treat called the Marion Regional Office at approximately 10:00 a.m. He stated that they had had a spill of the preservative from their retort the night of 3-24-87<sup>1988</sup>. Apparently, the door to the treatment cylinder did not get completely closed. When the cylinder was pressurized, the .9% chemical solution was forced out. Mr. Bond said between 5 to 10 gallons were lost. The spill did not leave the property. He had contacted the National Response Center, who informed him that this was not a reportable spill. He was calling IEPA because of past good working relationships and to insure that his cleanup plan was adequate.

The spill covered an approximate 5 yard x 15 yard area north of the treatment cylinder and west of the covered drip pad. Small ponds of bright green liquid were observed over this area. Mr. Bond planned to treat the affected area using cement as a neutralizing agent and absorbent. The entire area would then be excavated and the soil disposed of through their routine disposal site. (This site generates contaminated soil from cleaning catch basins associated with the treatment area). They were in the process of removing lumber from the area. A truck had been sent to pick up the dry cement. I observed a culvert adjacent to the spill site. I recommended this pipe be blocked until the clean-up was complete.

I left the site and proceeded to where the ditch which runs south of the plant, which the culvert empties into, was crossed by Court Street. The same bright green discoloration was observed in the ditch. I went over to Russell Street, which is one more block east. The bright green discoloration was still seen in the ditch. I returned to Perma-Treat and told them of my findings. I instructed them to notify the Illinois notification number as the spill had left the site. I returned to the Marion office to involve DWPC/FOS in this situation. The ditch, otherwise known as West Creek, empties into Crab Orchard Creek and Crab Orchard Lake, which are just downstream on the south edge of Marion. Dwight Hill continued the investigation with me. Thunderstorms had moved through the Marion area during the night on 3-24-88. We went to the Rt. 37 bridge over C.O. Creek, which is just before it enters the lake. A small amount of bright green discoloration was seen along the edge of back water near the bridge supports. None was seen in the flowing water. No indications were seen at Market and Boyton streets, or the Monroe Street Bridge. The discoloration was seen at the Ice Plant bridge (College and Granite) and was questionable at the Holland Street bridge. Water samples were taken at the ice plant and Holland Street. We returned to Permi-Treat.

APR 13 1988

IEPA-DLPC



Perma-Treat  
March 25, 1987  
Page 2

Upstream and downstream samples were taken. Mr. Bond was anticipating adding concrete to the ditch to neutralize the material. This was discouraged as it would allow the metals to precipitate out, resulting in contaminated sediments. As flow rates in the creeks were high, and the solution was water soluble, no action will be taken with the material in the ditch. Mr. Bond modified the amount lost was 25 gallons. This was based on tank guage readings.

GES:cs/0473L/4-7-88

cc: DLPC-Marion  
DWPC-Marion

RECEIVED  
APR 13 1988  
IEFA-DLPC

**D. Corrective  
Action**

D-8J

May 5, 1998

Ms. Patricia Brown-Derocher  
Regional Manager  
TechLaw, Inc.  
20 North Wacker Drive  
Suite 1260  
Chicago, Illinois 60606


Reference: contract No. 68-W4-00006; Work Assignment R05052

Dear Ms. Brown-Derocher:

Thank you for your May 1, 1998, letter regarding the Perma-Treat of Illinois, Inc. facility (ILD 063 698 971) located in Marion, Illinois. The report is adequate and I have concluded that the submission along with the scoring sheets will constitute the final deliverable for the facility. Please provide a copy of the final report to the appropriate IEPA and facility contacts.

Do not hesitate to call me at (312) 886-0977 should you have additional questions or need additional clarification.

Sincerely,

  
Gerald W. Phillips  
Corrective Action Process Manager  
Waste, Pesticides and Toxics Division

cc: Bill Wesley, TechLaw  
F. Norling, U.S. EPA



**TECHLAW INC.**

20 NORTH WACKER DRIVE, SUITE 1260, CHICAGO, IL 60606

PHONE: (312) 578-8900

FAX: (312) 578-8904

RZ2.R05052.01.ID.151

April 30, 1998

Mr. Gerald Phillips  
U.S. Environmental Protection Agency  
Region 5 D-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052; Preliminary Assessment/Visual site Inspection Report; Perma-Treat of Illinois, Inc., Marion, Illinois; EPA ID No. ILD063698971; PA/VSI Report and NCAPS Scoring Report; Task 04 Deliverable


Dear Mr. Phillips:

Please find enclosed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report and the NCAPS Scoring Report for the referenced facility.

As can be seen by the NCAPS Report, the total migration score is 44.40 with media-specific scores of 57.04 for groundwater, 52.86 for surface water and 42.86 for onsite.

Should you have any questions or require additional information, please feel free to contact me at (312)345-8963 or Mr. Bill Wesley at (312)345-8955.

Sincerely,

  
Patricia Brown-Derocher  
Regional Manager

cc: F. Norling, EPA Region 5, w/o attachment  
W. Jordan/Central Files  
W. Wesley  
Chicago Central Files

c:\ehs\52\52id151.wpd



**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT  
FOR  
PERMA-TREAT OF ILLINOIS, INC.  
MARION, ILLINOIS  
EPA ID NO. ILD063698971**

**Submitted to:**

**Mr. Gerald Phillips  
U.S. Environmental Protection Agency  
Region 5 D-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604**

**Submitted by:**

**TechLaw, Inc.  
20 North Wacker Drive, Suite 1260  
Chicago, Illinois 60606**

**EPA Work Assignment No.  
Contract No.  
TechLaw WAM  
Telephone No.  
EPA WAM  
Telephone No.**

**R05052  
68-W4-0006  
Mr. Rob Young  
312/345-8966  
Mr. Gerald Phillips  
312/886-0977**

**April 30, 1998**

**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT  
FOR  
PERMA-TREAT OF ILLINOIS, INC.  
MARION, ILLINOIS  
EPA ID NO. ILD063698971**

**TABLE OF CONTENTS**

	Page
I. EXECUTIVE SUMMARY .....	I-1
II. SITE DESCRIPTION .....	II-1
III. SOLID WASTE MANAGEMENT UNITS .....	III-1
IV. AREAS OF CONCERN .....	IV-1
V. CONCLUSIONS .....	V-1
VI. REFERENCES .....	VI-1

**Tables**

Table 1	Solid Waste Management Units and Areas of Concern Summary .....	III-2
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**Appendices**

Appendix A	Visual Site Inspection Photograph Log
Appendix B	Visual Site Inspection Field Notebook
Appendix C	Facility Location Facility Layout and SWMU/AOC Locations

## I. EXECUTIVE SUMMARY

The RCRA Facility Assessment (RFA) is the first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The purpose of the RFA is to identify environmental releases or potential releases from solid waste management units (SWMUs) and areas of concern (AOCs) that may require corrective action by the facility owner. A Preliminary Assessment/Visual Site Inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at Perma-Treat of Illinois, Inc. (Perma-Treat) located in Marion, Illinois.

A preliminary assessment (PA) of the available U.S. Environmental Protection Agency (U.S. EPA) and Illinois EPA file materials was conducted to familiarize the TechLaw, Inc. (TechLaw) subcontractor Metcalf & Eddy, Inc. (M&E) with past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes and waste management practices at the Perma-Treat facility. A Visual Site Inspection (VSI) was conducted on March 24, 1998 by an M&E Team to identify and characterize SWMUs and AOCs. File material and information was provided to the M&E team during the VSI by Mr. Rudy Bond, President of Perma-Treat, and Mr. Chris Edmonds, the Plant Manager. They were accompanied by Mr. Matthew Fauss of RAPPS Engineering and Applied Science, a consultant to Perma-Treat. Photographs were taken during the VSI and are documented in Appendix A. The VSI Field Notebooks are included in Appendix B, and a Facility Location and a Site Map showing SWMU and AOC locations are presented in Appendix C.

A total of six SWMUs and one AOC were identified. These are described in more detail in Sections III and IV of this report. The release potential for five of the SWMUs was determined to be low based on the results of the PA/VSI. The release potential for the Former Hazardous Waste Pile (SWMU 2) was rated as high due to elevated levels of arsenic, chromium, and copper detected in the soil during a Site Screening Inspection performed in March 1994. The release potential for the 1988 CCA Spill Area (AOC A) was also rated as high. Soils were removed from the area to address the spill, however analytical results from the Site Screening Inspection noted above indicated that arsenic, chromium, and copper were still present at levels above background.

## II. SITE DESCRIPTION

Perma-Treat of Illinois, Inc. (Perma-Treat) manufactures and treats dimensioned lumber and landscape timbers. The treated wood is commonly known as Wolmanized wood. The treated lumber is either sold at the site, or sold to retail stores for resale.

The Perma-Treat facility is located on Permatreat Drive near North Carbon Street and Industrial Park Drive in Marion, Williamson County, Illinois. Perma-Treat has been in operation since 1982. The facility currently employs approximately 20 hourly and salary employees. The facility occupies 15 acres. The majority of the property is used for the storage of lumber. There are also several building structures at the facility.

The storage areas are separated into the Western Storage Area and the Central Storage Area. The Western Storage Area occupies the western third of the property. It is used to store scrap wood, sheet metal, windows, abandoned tires and other miscellaneous debris in large uncontrolled piles. The Central Storage Area is located on the eastern half of the property. It is used to store untreated wood as well as processed and treated wood.

The main building of concern is the Treatment Building/Drip Pad Pole Barn. This structure is located in the southeast corner of the property. All of the SWMU's and AOC's are located in or adjacent to this building. It is approximately 7,500 sq. ft. with a concrete floor. In the northern and eastern portions of the building, which are used as a drip pad for treated wood, the floor slopes towards the center of the building to a concrete sump located at the entrance to a pressure cylinder. The remainder of the building contains an employee lunch room, a Valve Room, and the Tank Room. The Tank Room contains several aboveground storage tanks (ASTs) which are located in a concrete secondary containment area connected to the sump. The Tank Room Secondary Containment (SWMU 4) is approximately 50 feet by 52 feet with a depth of approximately 3 feet. At the northeastern corner of this building, outside of the drip pad, is a Maintenance Garage. Light maintenance of Perma-Treat vehicles is done in this area. A Safety Kleen Unit (SWMU 5) and the Used Oil Drum Storage Area (SWMU 6) are located here in the maintenance garage.

Other buildings at the facility include two wood working shops in the south central portion of the property. A dry kiln is located just to the west of the wood working shops. In the northeast corner of the property, near the entrance, is a retail office and two pole barns used to store treated wood prior to sale. A yard office is located in the center of the property, where the administrative staff works. As stated above, no SWMU's or AOC's were identified in these structures.

The office buildings are kept locked when not occupied. The Treatment Building/Drip Pad Pole Barn cannot be secured due to openings in the wall. Overall the property is not secured. The main entrance does have a gate, however the perimeter of the property is not fenced. The plant normally operates three 8-hour shifts, six days per week.



Ten acres of the property currently owned by Perma-Treat were previously vacant fields owned by the City of Marion. Perma-Treat purchased the property from the City of Marion in 1982. An additional five acres of vacant land were purchased by Perma-Treat from the City of Marion in 1990. According to a letter prepared by counsel to Perma-Treat, dated May 13, 1993, the City of Marion previously used part of the property as a municipal sanitary sewage lagoon. The dates which this lagoon was in operation are not stated. Mr. Chris Edmonds of Perma-Treat stated that he had heard that a brick factory had been located somewhere at the site at one time, but he was not sure when or where. There was reportedly no evidence of a brick factory when Perma-Treat purchased the property.

The facility is located in a mixed commercial and residential area. Residential units are located immediately west of the facility. To the southeast of the facility, across the Crab Orchard and Egyptian Railroad tracks is a storage yard for Ameren-CIPS, a public utility company. To the southwest of the facility across the same railroad tracks is a Pennzoil blending facility. Century Lubricant Specialists are located to the east of the facility, as well as a building which houses a U.S. Dept. of Agriculture facility. To the north of Perma-Treat are a Frito Lay Warehouse, a public storage facility, and Todd Uniform, a uniform supply service.

Perma-Treat manufactures and preserves landscape timbers and dimensioned lumber. First the lumber is cut and planed to specific dimensions in one of the two woodworking shops. Sawdust and wood scraps are collected and sold as mulch to the public. Metal banding from the raw lumber is cut down and drummed. It is then sent to Gary's Scrap Metal in Marion for recycling.

After the lumber has been cut to specific dimensions, it is sent to the Dry Kiln where it is dried. The dry kiln is a natural gas fired unit. After the wood has been dried, it is placed in one of the pole barns to await preservation.

Preservation of the lumber is done with chromated copper arsenate (CCA). This process is commonly known as "Wolmanizing". The dry lumber is placed on and strapped to a car on rail tracks. The car is then rolled into a pressure cylinder where a vacuum is applied. The pressure cylinder is then filled with a solution of approximately 1% CCA. The pressure cylinder is pressurized to 160 psi to force the solution into the wood. Once the desired amount of solution has been absorbed by the wood, the cylinder is drained and the lumber is removed.

The lumber is allowed to drip and air dry on the Drip Pad and Sump System (SWMU 3) for two to four days. CCA solution which drips from the lumber flows and is swept to the sump where it is accumulated and transferred to the Effluent Tank in the Tank Room for recycling. Bark and dirt also fall from the lumber during the drying process. This is also swept to the sump where it is accumulated. The "sump mud" is then placed on a drying rack located in the Tank Room Secondary Containment (SWMU 4) to dewater. The dewatered mud is placed in a drum and stored in the Hazardous Waste Drum Storage Area (SWMU 1) for less than 90 days prior to disposal.

An Enforcement Notice Letter was sent to Perma-Treat on July 14, 1993. Perma-Treat appealed and won the enforcement action, halting IEPA's RCRA enforcement action in 1994. Closure of the Former Hazardous Waste Pile (SWMU 2) was reportedly completed on August 5, 1994. The IEPA observed the decontamination procedures.

### Environmental Setting

The Perma-Treat facility is located in Williamson County in southern Illinois. The facility is located in the City of Marion. Surface elevations in the vicinity are about 450 feet above Mean Sea Level. The topographic relief in the area is flat. Land use in the surrounding region is a mix of commercial and residential. The nearest residential area is an apartment complex 0.1 miles immediately west of the facility. To the southeast of the facility, across the Crab Orchard and Egyptian Railroad tracks, is a storage yard for Ameren-CIPS, a public utility company. To the southwest of the facility across the same railroad tracks is a Pennzoil blending facility. Century Lubricant Specialists are located to the east of the facility as well as a U.S. Dept. Of Agriculture facility. To the north of Perma-Treat are a Frito Lay Warehouse, a public storage facility, and Todd Uniform, a uniform supply service. Based on a review of the United States Geological Survey (USGS) topographical map of the area surrounding the facility, the Crab Orchard National Wildlife Refuge is located approximately one and a half miles southwest of the facility and is the nearest sensitive environment.

Regional geology in the vicinity of the sites is described in the CERCLA Preliminary Assessment Report which was prepared by the IEPA, dated June 1991.

"According to a 1959 soil report, the undisturbed soils in the area near the Perma-Treat facility were predominantly Cisne and Hoyleton silt loams which were developed under prairie grasses. These are described as poorly drained and somewhat poorly drained soils, respectively. Both soils are strongly acidic. The Cisne is also considered to be a nearly level claypan soil. Both soils are composed of silty loam in the A horizon and silty clay loam below about eighteen inches (18").

... According to water well logs and other Illinois State Geological Survey Literature, the subsurface geology of the area consists of relatively thin (less than ten feet to as much as sixty feet) unconsolidated glacial drift. Since the drift is so thin in this area, it is difficult to obtain water supplies from it. Immediately below the drift is bedrock of the Pennsylvanian System which contains sandstone and limestone aquifers. Most domestic water supplies are obtained from these sandstone aquifers from roughly fifty to as much as eight-hundred feet deep, according to one source. Below the Pennsylvanian are the (progressively deeper) Mississippian, Devonian, Silurian, Ordovician, and Cambrian systems."

CCA (50 % concentration) is received at Perma-Treat by bulk truck and is pumped to a 7,000 gallon vertical AST in the Tank Room. From this tank it is added to the main work tank where it is diluted with city water and recovered CCA solution from the Drip Pad and Sump System (SWMU 3) to a working concentration of approximately 1% CCA. There are two additional work tanks which are used to store CCA solutions of other concentrations for different types of lumber treatment.

#### Release History

A release of CCA solution occurred on March 24, 1988 when the door to the treatment cylinder was not completely closed. When the cylinder was pressurized, the solution was forced out of the door. It was estimated that 25 gallons of 0.9% CCA solution was spilled. An area of approximately 15 ft. by 45 ft. north of the treatment building and west of the drip pad was impacted. This is the 1988 CCA Spill Area (AOC A). Further investigation by the IEPA indicated that the CCA solution had been carried by a thunderstorm down a drainage ditch from this area due south into West Creek along the southern border of the property. There were traces of CCA observed in West Creek and in Crab Orchard Creek, the creek into which the West Creek empties. Due to the high flow of the creek resulting from the rains, no action was deemed necessary by the IEPA for the CCA release in West Creek and Crab Orchard Creek.

Mr. Edmonds of Perma-Treat stated that soil from the 15 ft. by 45 ft. area was removed and shipped to Chem Waste in Emile, Alabama. The exact quantity and date of the soil removal were not known by Mr. Edmonds, nor were any confirmation samples collected from the area.

During a Site Screening Inspection performed on March 23, 1994 by an Alternative Remedial Contracting Strategy (ARCS) V contractor authorized by U.S. EPA, two surface soil samples were collected in the main spill area. One of the samples had arsenic detected at 5,490 mg/kg and chromium at 2,640 mg/kg. Arsenic was not detected in the second sample, and chromium was detected at 159 mg/kg.

Perma-Treat has contracted RAPPS of Mt. Vernon, Illinois to perform a Focused Site Investigation. It is planned that the data gathered during this investigation will be used to determine remediation objectives, and to evaluate whether a Remedial Action Plan is necessary.

Soil sampling conducted near the drip pad in the area of the Former Hazardous Waste Pile (SWMU 2) during the Site Screening Inspection on March 23, 1994 also indicated levels of arsenic, chromium, and copper above the measured background levels. Soils were removed from the area immediately adjacent to the east wall of the drip pad during closure activities due to visible staining on the sides of the drip pad wall. The samples collected during the March 23, 1994 Site Screening Inspection were beyond the excavated area.

There are no groundwater wells located at the facility. The nearest private well is approximately one tenth of a mile west of the site as reported in the Site Screening Inspection Report (per the 1993 Illinois State Water Survey). The use of this well was not documented in the report. The report did state that the nearest private drinking water well was over one mile from the facility. Most of the residences in the area are provided municipal drinking water by the City of Marion from Lake Marion, two and a half miles south of the facility. The depth to groundwater at the facility was not stated in the file material reviewed. As stated above, the main aquifer system in the area is the bedrock of the Pennsylvanian System which varies in depth below land surface from 10 to 60 feet in the area. Therefore, it is assumed that the depth to ground water is approximately 10 feet at the Perma-Treat facility.

Surface run-off from the site flows to the south to a drainage ditch/intermittent stream along the south property boundary known as West Creek. West Creek flows into Crab Orchard Creek, the nearest surface water body and the main regional drainage feature for the area, approximately two miles southeast of Perma-Treat. Crab Orchard Creek, which flows from east to west, flows to the Crab Orchard National Wildlife Refuge and Crab Orchard Lake (a sensitive environment). The nearest downstream water intake is in Crab Orchard Lake which supplies drinking water to the Crab Orchard National Wildlife Refuge. Crab Orchard Creek is used for recreation.

The average net precipitation for the vicinity is eight inches as reported in the NCAPS Scoring Guidance (44 inches normal precipitation less 36 inches of mean lake evaporation). The 1-year 24-hour rainfall event is three inches per this same guidance. The facility is not located in a 100 year flood plain.

### Regulatory History

According to the CERCLA Preliminary Assessment (PA) Report prepared by the IEPA in June of 1991, Perma-Treat filed a "Notification of Hazardous Waste Activity", U.S. EPA Form 8700-12, on May 18, 1984. The form classified Perma-Treat as a "full generator" which generated a "characteristically toxic waste (D000)". IEPA representatives were contacted regarding the existence/nature of a "D000" waste code, and they were not familiar with such a waste code. It should be noted that although D004 and D007 hazardous waste codes were apparently not included on the May 18, 1984 Notification, other available file materials suggest that those waste codes were managed at the site in 1984.

The first regulatory correspondence in the file material reviewed was a Compliance Inquiry Letter from the IEPA to Perma-Treat. The IEPA had identified apparent violations during an August 8, 1985 inspection. The apparent violations were related to improper storage of hazardous wastes at the facility. A follow-up inspection was performed by the IEPA on January 13, 1986, and as reported in a letter from the IEPA to Perma-Treat, the previous apparent violations had been addressed.

The IEPA submitted a Compliance Inquiry Letter dated May 13, 1986 to Perma-Treat regarding fugitive dust generated from the roadways which was affecting the neighboring properties. Perma-Treat responded to the IEPA with a letter dated May 27, 1986 saying that they were retaining companies with expertise in addressing this problem.

On July 3, 1986, another Compliance Inquiry Letter was sent by the IEPA to Perma-Treat regarding Perma-Treat's failure to submit an Annual Hazardous Waste Report. The file materials reviewed did not contain a response to this letter.

On March 25, 1988, an IEPA Memorandum was sent to the file regarding a spill of CCA (AOC A) that occurred at Perma-Treat on the night of March 24, 1988. The spill affected a 15 foot by 45 foot area of the yard just north of the Treatment Building. Evidence of CCA was traced to West Creek along the southern border of the property. Traces of CCA were observed on the surface of West Creek from the southeast corner of the Perma-Treat property to approximately one and a half miles downstream. The release was called in to the IEPA and was assigned Incident #3796. Due to the flow of the creek, the IEPA representative coordinating the spill response recommended that no action be taken to address the traces of CCA in the creek.

On August 28, 1990, the Perma-Treat facility was placed in the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) as the result of an environmental focus on wood treating facilities.

A CERCLA Preliminary Assessment Report was prepared by the IEPA for the Perma-Treat facility sometime in 1991. In general, the report stated that it was highly likely that someone could come in direct contact with potentially contaminated soil at the facility. There were two noted potential receptors for contamination from the facility. The apartment complex located immediately west of the site and wetlands located along West Creek and Crab Orchard Creek. The facility was assigned an overall low priority based on the findings, and it was recommended that the site be advanced to the screening inspection stage.

A RCRA Inspection was performed by the IEPA on June 20, 1991. Some items identified as concerns during the inspection included the fact that the Former Hazardous Waste Pile (SWMU 2) had been stored onsite for more than 90 days, and general improper storage of hazardous wastes such as unsealed drums. These concerns were communicated to Perma-Treat in a Compliance Inquiry Letter from the IEPA dated September 19, 1991. A follow-up visit was performed by the IEPA on September 23, 1991. During this visit, Perma-Treat indicated to IEPA that they planned to close the Former Hazardous Waste Pile (SWMU 2).

Perma-Treat responded to the Compliance Inquiry Letter from the IEPA dated September 19, 1991 with a letter from their counsel, Mohan, Alewelt, Prillaman & Adami dated October 18, 1991. In summary, they stated that their intention was to close the Former Hazardous Waste Pile (SWMU 2) by demonstrating closure by removal and decontamination. A Closure Plan was subsequently received by the IEPA on July 31, 1992. The preparer of the Closure Plan was not

identified on the copy present in the file material reviewed. An internal IEPA memorandum dated August 20, 1992 documented deficiencies in the Closure Plan. These deficiencies included discrepancies in data reported and a lack of plans addressing the pallets and screen from the dewatering structure and decontamination of the stained sidewalls of the drip pad.

Walker Engineering & Contracting submitted a revised Closure Plan for the Perma-Treat facility on October 9, 1992. This plan was conditionally approved by the IEPA in a letter dated December 11, 1992. The approval letter was not in the file materials reviewed, however it was referenced in a letter dated May 13, 1993 from Mohan, Alewelt, Prillaman & Adami requesting changes to the October 9, 1992 Closure Plan. Requested were an extension of 45 days for the implementation of the plan and a waiver of sampling and disposal of the wash and rinse waters. Perma-Treat intended to recycle the wash and rinse waters in the wood treatment process.

A Compliance Evaluation Inspection was performed by the IEPA on July 8, 1993. The inspection concluded that Perma-Treat was apparently properly handling their hazardous waste (CCA contaminated bark and dirt). The only outstanding problem noted was that the decontamination of the Former Hazardous Waste Pile (SWMU 2) had not yet been performed. An Enforcement Notice Letter was subsequently sent to Perma-Treat on July 14, 1993. Perma-Treat appealed and won the enforcement action, halting an IEPA RCRA enforcement action in 1994.

On August 5, 1994, the IEPA observed the decontamination procedures at the Former Hazardous Waste Pile (SWMU 2).

On March 26, 1996, a six count complaint was filed by the Illinois Attorney General. The counts consisted of operating without a RCRA permit, failure to properly inspect, failure to protect against environmental impact, failure to utilize a contingency plan, failure to maintain appropriate records, and failure to report a release of hazardous waste to the environment.

A Site Screening Inspection Final Report was submitted to U.S. EPA on October 24, 1996. It was prepared by an Alternative Remedial Contracting Strategy (ARCS) V contractor authorized by the U.S. EPA. This report contained soil and sediment sampling data from a March 23, 1994 sampling event.

Sediment samples collected on March 23, 1994 from the drainage ditch impacted by the 1988 CCA release showed arsenic (163 and 179 mg/kg), calcium (93,200 and 68,800 mg/kg), chromium (114 and 130 mg/kg), copper (95.9 and 114 mg/kg), and magnesium (8,180 and 6,150 mg/kg) substantially above the levels detected in a background sample (arsenic - 7.3 mg/kg, calcium - 3,130 mg/kg, chromium - 11.7 mg/kg, copper - 29 mg/kg, and magnesium 1,650 mg/kg).

Two surface soil samples collected on March 23, 1994 in the 1988 CCA Spill Area (AOC A) showed levels of arsenic (5,490 mg/kg), calcium (102,000 and 167,000 mg/kg), chromium (2,640 and 159 mg/kg), copper (2,510 and 132 mg/kg), magnesium (11,500 mg/kg) and potassium (1,490 and 1,570 mg/kg) above background sample concentrations (arsenic - 11.5 mg/kg, calcium - 24,700 mg/kg, chromium - 14.2 mg/kg, copper - 8.2 mg/kg, magnesium - 3,170 mg/kg, and potassium - 356 mg/kg). Three soil samples were also collected from outside the drip pad in the vicinity of the Former Hazardous Waste Pile (SWMU 2). These samples showed arsenic (636 mg/kg), chromium (157 to 1,700 mg/kg), copper (151 to 1,430 mg/kg), lead (114 mg/kg) and potassium (834 to 1,240 mg/kg) above the same background levels. The background level for lead was reported as 22.5 mg/kg.

The facility discharges sanitary waste water to the municipal sanitary sewer system of Marion. There is no discharge of industrial water to the municipal sanitary sewer. The facility does not maintain and does not appear to be required to maintain any NPDES, storm water, or air permits.

### III. SOLID WASTE MANAGEMENT UNITS

This section presents descriptions of the solid waste management units (SWMUs) and areas of concern (AOCs) identified during the PA and VSI at the Perma-Treat facility. Photograph numbers correspond to those presented in the Photograph Log in Appendix A.



**TABLE 1**  
**Solid Waste Management Units and Areas of Concern Summary**  
**Perma-Treat of Illinois, Inc., Marion, Illinois**

<b>SWMU/AOC No.</b>	<b>SWMU/AOC Name</b>	<b>Release Potential</b>
SWMU 1	Hazardous Waste Drum Storage Area	Low
SWMU 2	Former Hazardous Waste Pile	High
SWMU 3	Drip Pad and Sump System	Low
SWMU 4	Tank Room Secondary Containment	Low
SWMU 5	Safety Kleen Unit	Low
SWMU 6	Used Oil Drum Storage Area	Low
AOC A	1988 CCA Spill Area	High

**SWMU 1 - Hazardous Waste Drum Storage Area**

**Report Photo No(s):** 1

**Log Book Photo No(s):** 1-7

**Period of Operation:** 1982 to present

**Location:** This unit is located on the southeastern portion of the drip pad inside the Pole Barn adjacent to the Treatment Building.

**Physical Description:** This unit consists of a 10 ft. by 10 ft. area on the concrete drip pad of the treatment area. Any releases from this unit would flow to and be contained in the collection and Drip Pad and Sump System. The area is surrounded by a chain link fence cage which is locked at all times.

**Wastes Managed:** Wastes which are managed in this unit consist solely of 55-gallon drums of CCA contaminated dirt and debris from the cleaning of the drip pad and the collection sump. These wastes are not accumulated for more than 90 days. Approximately two drums (400 pounds each) of CCA contaminated dirt is generated per month (24 drums per year). These wastes are hazardous wastes (D004, D007, F035) and are shipped off site for disposal. The wastes are currently hauled off site by Terra First, Inc. (ALD 981023492) to Terra First - AL Storage Operations in Vernon, Alabama (ALD 983177015). Previously, wastes were handled by Hickson Corp. of Valparaiso, Indiana who took the waste to Chemical Waste Management in Emelle, Alabama.

**History of Releases:** No history of a release was identified during the PA or the VSI.

**Potential for Past/Present Release:**

<b>High</b>	( )
<b>Moderate</b>	( )
<b>Low</b>	( X )

**Conclusions:** There has been no reported release at this unit and there is no visible evidence that any release has occurred. The drip pad appears capable of containing any release that would occur from this unit. Therefore, no further sampling or investigation is needed at this unit.

## **SWMU 2 - Former Hazardous Waste Pile**

**Report Photo No(s):** 2, 3, 4 and 5

**Log Book Photo No(s):** 1-1, 1-2, 1-3 and 1-4

**Period of Operation:** 1982 to 1991

**Location:** This unit was located inside the Pole Barn on the southernmost portion of the drip pad.

**Physical Description:** This unit consisted of a 15 ft. by 15 ft. pile of dirt and bark from the clean-out of the Drip Pad and Sump System (SWMU 3). The dirt and bark were placed on top of a screen which was supported by wooden pallets at each of the four corners. The screen aided in the dewatering of the debris prior to its being drummed for disposal. The CCA solution which dripped from the debris returned to the recycle system by flowing north on the concrete drip pad to the sump, where it was recovered for recycling in the wood treatment process. The drip pad is elevated above the outside ground surface to prevent run-on of storm water, and the slope of the pad prevented leachate from the pile from leaving the pad.

**Wastes Managed:** This unit managed wastes from clean-out of the Drip Pad and Sump System (SWMU 3). Perma-Treat typically performed routine cleaning of these areas monthly until two drums of waste were accumulated. Volume of dirt and debris in excess of the two drums accumulated in the sump and on the drip pad. Normally in January, Perma-Treat cleaned the entire pad and sump, thus generating the waste pile of approximately 20 cubic yards of CCA contaminated dirt and debris. The waste pile which was present prior to the closure of this unit had exceeded the 90 day on site storage limit and was characteristically hazardous for chromium and arsenic (D007 and D004). The waste pile was removed from the site by Chemical Waste Management and disposed of at Adams Center Landfill in Fort Wayne, Indiana.

**History of Releases:** During an IEPA Inspection on June 20, 1991, green staining of the east wall of the drip pad was noted. As was required by the conditionally approved closure plan, soil was removed from this area during closure activities on October 29, 1991 and was disposed with the pile material. The removed soils were included in 20 cubic yards of soil shipped offsite for disposal. The exact quantity of soil removed was not specified. Perma-Treat was not required to collect confirmation samples during closure activities. A Site Screening Inspection (SSI) was performed at the site on March 23, 1994 which included the collection of soil samples in the vicinity of this unit. Of the three samples collected, all three had chromium and copper levels above background as defined by a separate sample collected during the SSI. Arsenic was above the background level in one of these samples.

**Potential for Past/Present Release:**

**High ( X )**  
**Moderate (   )**  
**Low (   )**

**Conclusions:** The results of the soil sample analyses from the 1994 SSI appear to indicate that soils near this unit have been contaminated. The extent of this contamination has not been determined. Further sampling of the soils to the south and east of this unit should be performed to delineate the contamination and to determine if remediation is necessary. Any further actions should be coordinated with the IEPA.

### **SWMU 3 - Drip Pad and Sump System**

**Report Photo No(s):** 2, 3, 4, 6, and 7

**Log Book Photo No(s):** 1-1, 1-2, 1-3, 1-8, and 1-11

**Period of Operation:** 1982 to present

**Location:** This unit is located in the Pole Barn attached to the Treatment Building located on the southeastern portion of the property.

**Physical Description:** This unit consists of a concrete pad approximately 120 ft. by 60 ft. which is sloped towards a sump located in the west central portion of the pad. The concrete sump is approximately 10 ft. by 4 ft. by 1.5 ft. deep and is located at the door of the cylinder used to pressure treat lumber. The entire area is enclosed by a pole barn to prevent precipitation from entering the system.

Once wood has been treated in the Treatment Cylinder, it is removed and stored on this unit to dry. CCA which drips from the wood is swept towards the sump on a daily basis. From the sump, the CCA solution is recovered and stored in the Effluent Tank in the Tank Room where it is recycled into the treatment process.

**Wastes Managed:** During the drying and handling of the wood, dirt and debris contaminated with CCA fall from the wood onto the drip pad. This material is swept to the sump. Once a sufficient quantity has been accumulated, it is transferred to the Tank Room Secondary Containment (SWMU 4) to dewater it prior to drumming and disposal. Approximately two drums of contaminated dirt are generated per month (24 per year). The dewatered waste is drummed and stored in the Hazardous Waste Drum Storage Area (SWMU 1) for less than 90 days prior to disposal as a hazardous waste (D004, D007).

**History of Releases:** No history of a release was identified during the PA or the VSI.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low (X)

**Conclusions:** There has been no reported release at this unit and there is no visible evidence that any release has occurred. This unit appeared to be in good condition and of sufficient capacity for the purpose it serves. Therefore, no further sampling or investigation is needed at this unit.

#### **SWMU 4 - Tank Room Secondary Containment**

**Report Photo No(s):** 8 and 9

**Log Book Photo No(s):** 1-12 and 1-13

**Period of Operation:** 1982 to present

**Location:** This unit is located in the Treatment Building immediately southwest of the Drip Pad and Sump System (SWMU 3).

**Physical Description:** This unit consists of an approximately 50 ft. by 50 ft. by 3 ft. concrete structure. It is totally enclosed from the weather. Its main purpose is to contain any leaks or spills from the three Working Tanks, the CCA Raw Material Tank and the Effluent Tank. The sump mud drying rack is located in the southeast corner of this unit. It is a 3 ft. by 3 ft. by 1 ft. deep open-topped wooden box with a screen bottom which is used to dewater dirt and debris removed from the Drip Pad and Sump System (SWMU 3). A drum staging area is adjacent to the sump mud drying rack on the elevated wood floor within this unit. The dewatered dirt is placed in a 55-gallon steel drum, and is staged here until the drum is full. The drum is then moved to the Hazardous Waste Drum Storage Area (SWMU 1). CCA solution which drains from the sump mud drying box as well as any spilled CCA solutions from the tanks flows towards the northeast corner of this unit where it flows through a pipe which is connected to the sump of the Drip Pad and Sump System (SWMU 3). The CCA solution is recovered and placed in the Effluent Tank for recycling in the wood treatment process.

**Wastes Managed:** CCA contaminated dirt and debris is removed from the Drip Pad and Sump System (SWMU 3) and placed in this unit to dewater. Approximately 24 drums (9,600 pounds) of CCA contaminated dirt are dewatered in the sump mud drying rack located in this unit per year. After the material is dewatered, it is drummed and moved to the Hazardous Waste Drum Storage Area for disposal as a hazardous waste (D004, D007).

CCA solution which drains from the dirt and debris in the sump mud drying rack and any spilled solutions are collected as described above and recycled in the wood treatment process. Thus the solution is not considered a hazardous waste.

**History of Releases:** No history of a release was identified during the PA or the VSI.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low (X)

**Conclusions:** There has been no reported release at this unit and there is no visible evidence that any release has occurred. The secondary containment structure of the Tank Room appeared to be in good condition and had the capacity to contain any releases from this unit. Therefore, no further sampling or investigation is needed at this unit.

### **SWMU 5 - Safety Kleen Unit**

**Report Photo No(s):** 10

**Log Book Photo No(s):** 1-9

**Period of Operation:** 1982 to present

**Location:** This unit is located in the northeast corner of the Mechanics Room. The Mechanics Room is located in the northeastern corner of the Treatment Building Pole Barn. It is not part of the Drip Pad and Sump System, however it is enclosed by the same Pole Barn.

**Physical Description:** This unit is a standard Safety Kleen parts washing unit. It consists of a 55-gallon drum which contains solvent, with a basin which rests on top of the drum. It sits on the concrete floor of the Mechanics Room. Some oily stains were noted on the concrete floor in the general vicinity of this unit. The source of the staining was not positively determined to be a result of the operation of this unit. Other potential sources include the Waste Oil Storage Area (SWMU 6) which is located immediately north of this unit, or it could be the result of leaks or spills which have occurred during maintenance of vehicles in this area. It appeared that the staining was limited to the floor in this area and had not spread outside of the Mechanics Room. The concrete floor appeared to be in good condition with no cracks or holes.

**Wastes Managed:** Approximately 50 gallons of waste solvents (F003) (D018) are removed from this unit every 90 days for recycling by Safety Kleen.

**History of Releases:** No history of a release was identified during the PA or the VSI.

**Potential for Past/present Release:**

<b>High</b>	<b>( )</b>
<b>Moderate</b>	<b>( )</b>
<b>Low</b>	<b>(X)</b>

**Conclusions:** There has been no reported release at this unit and there is no visible evidence that any release has occurred. Staining in the vicinity of this unit appeared to be contained by the concrete floor of the Mechanics Room. Therefore, no further sampling or investigation is needed at this unit at this time.



## **SWMU 6 - Used Oil Drum Storage Area**

**Report Photograph No.:** 10

**Log Book Photograph No(s):** 1-9

**Period of Operation:** 1982 to present

**Location:** This unit is located in the northeast corner of the Mechanics Room. The Mechanics Room is located in the northeastern corner of the Treatment Building Pole Barn. It is not part of the Drip Pad and Sump System (SWMU 3), however it is enclosed by the same pole barn.

**Physical Description:** This unit consists of one 55-gallon drum and one slightly smaller drum (approximately 40 gallons) which contain waste oils. They sit on the concrete floor of the Mechanics Room, which appeared to be in good condition with no cracks or holes. There is no secondary containment provided for this unit. Some oily stains were noted on the concrete floor in the general vicinity of this unit. The source of the staining was not positively determined to be a result of the operation of this unit. Other potential sources include the Safety Kleen Unit (SWMU 5), located immediately south of this unit, or leaks or spills from the maintenance of vehicles in this area. It appeared that the staining was limited to the floor in this area and had not spread outside of the Mechanics Room.

**Wastes Managed:** Approximately 90 gallons of waste oil is removed from this unit every 90 days for recycling by Safety Kleen. The waste oil is removed by Safety Kleen when they service the Safety Kleen Unit (SWMU 5). The oil is not a listed hazardous waste and no information was found which would indicate that it carries any characteristic hazardous waste codes.

**History of Releases:** No history of a release was identified during the PA or the VSI.

**Potential for Past/Present Release:**

<b>High</b>	<b>( )</b>
<b>Moderate</b>	<b>( )</b>
<b>Low</b>	<b>(X)</b>

**Conclusions:** There has been no reported release at this unit and there is no visible evidence that any release has occurred. Staining in the vicinity of this unit appeared to be contained by the concrete floor of the Mechanics Room. Therefore, no further sampling or investigation is suggested for the unit at this time.

#### IV. AREAS OF CONCERN

This section presents descriptions of the Areas of Concern (AOCs) identified during the PA and VSI at the Perma-Treat facility. Photograph numbers correspond to those presented in the Photograph Log in Appendix A.

## **AOC A - 1988 CCA Spill Area**

**Report Photo No(s):** 11, 12, 13, and 14

**Log Book Photo No(s):** 1-5, 1-6, 1-21, and 1-22

**Description:** A release of CCA solution occurred on March 24, 1988 when the door to the treatment cylinder was not completely closed. When the cylinder was pressurized, the solution was forced out of the door. It was estimated that 25 gallons of 0.9% CCA solution was spilled. An area of approximately 15 ft. by 45 ft. north of the treatment building and west of the drip pad was impacted. Further investigation by the IEPA revealed that the CCA solution had been carried by a thunderstorm down a drainage ditch from this area due south into West Creek along the southern border of the property. There were traces of CCA observed in West Creek and in Crab Orchard Creek, the creek into which the West Creek discharges. Due to the high flow of the creek resulting from the rains, no action was deemed necessary by the IEPA for the CCA in the West Creek or Crab Orchard Creek.

Mr. Edmonds of Perma-Treat stated that soil from the 15 ft. by 45 ft. area was removed and shipped to Chemical Waste Inc. Emile, Alabama. The exact quantity and date of the soil removal were not known by Mr. Edmonds, nor were any confirmation samples collected from the area.

During a Site Screening Inspection performed on March 23, 1994, two surface soil samples were collected in the main spill area. One of the samples had arsenic detected at 5,490 mg/kg and chromium at 2,640 mg/kg. Arsenic was not detected in the second sample and chromium was detected at 159 mg/kg.

Perma-Treat has contracted RAPPS of Mt. Vernon, Illinois to perform a Focused Site Investigation. It is planned that the data gathered during this investigation will be used to determine remediation objectives, and to evaluate whether a Remedial Action Plan is necessary.

**Conclusions:** Further sampling and possible remediation of this AOC appears warranted due to the elevated levels of arsenic and chromium detected during the Site Screening Inspection. Perma-Treat appears to be proceeding with a soil investigation with their consultant RAPPS. The IEPA should be involved with all future activities regarding this AOC.

## V. CONCLUSIONS

Based on observations made during the VSI and analytical results of soil sampling conducted at the facility, further investigations under Corrective Action Authorities appear warranted for one SWMU and the AOC. It is recommended that any further actions under Corrective Action Authorities described below be coordinated with any existing Illinois EPA-approved activities.

The action suggested for this facility is outlined below:

- Further soil sampling is suggested for the areas adjacent to the south and east of the Former Hazardous Waste Pile (SWMU 2).

Additional soil sampling at the above unit is warranted because previous sampling data from the Site Screening Inspection indicates contaminated soils are present east and south of the Former Hazardous Waste Pile (SWMU 2).

- Further soil sampling is suggested for the 1988 CCA Spill Area (AOC A).

Additional soil sampling at the above unit is warranted because previous sampling data from the Site Screening Inspection indicates contaminated soils are still present in the 1988 CCA Spill Area (AOC A). Perma-Treat has indicated that they have contracted RAPPS, an environmental consultant, to address this issue.

- If soil sampling analytical results suggest that hazardous constituents could leach into a groundwater, groundwater sampling is suggested.
- No further actions are recommended for the other five SWMUs due to their low potential for releases to the environment.



## VI. REFERENCES

1. August 27, 1985 Compliance Inquiry Letter from the IEPA to Perma-Treat regarding results of the August 8, 1985 site inspection.
2. January 29, 1986 Letter from the IEPA to Perma-Treat regarding resolution of Aug. 27, 1985 issues.
3. May 13, 1986 Compliance Inquiry Letter from the IEPA to Perma-Treat regarding fugitive emissions.
4. May 27, 1986 Letter from Perma-Treat to IEPA responding to May 13, 1986 CIL.
5. July 3, 1986 Compliance Inquiry Letter from IEPA to Perm-Treat regarding submission of an Annual Hazardous Waste Report.
6. March 25, 1988 IEPA Memorandum discussing CCA spill incident.
7. June 20, 1991 IEPA Memorandum to the file regarding IS Inspection findings.
8. June 1991 IEPA CERCLA Preliminary Assessment Report.
9. September 19, 1991 Compliance Inquiry Letter from IEPA to Perm-Treat regarding submission of an June 20 IS Inspection.
10. September 23, 1991 IEPA Memorandum to the file regarding follow-up visit to June 20 IS Inspection.
11. October 18, 1991 Mohan, Alewelt, Prillaman & Adami letter to the IEPA responding to the September 19, 1991 CI letter.
12. July 31, 1992 Perma-Treat Closure Plan submitted to the IEPA for the waste pile.
13. August 20, 1992 IEPA Internal Memorandum discussing deficiencies in the July 31, 1992 Closure Plan.
14. October 9, 1992 Walker Engineering & Contracting Closure Plan submitted on behalf of Perma-Treat to the IEPA.
15. May 13, 1993 Mohan, Alewelt, Prillaman & Adami letter to the IEPA requesting changes to the conditionally approved October 9, 1992 Closure Plan.

16. July 9, 1993 IEPA Internal Memorandum regarding July 8, 1993 Compliance Evaluation Inspection.
17. July 14, 1993 IEPA Enforcement Notice Letter to Perma-Treat.
18. August 10, 1994 IEPA Internal Memorandum regarding oversight of decontamination activities at Perma-Treat on the waste pile area.
19. March 26, 1996 State of Illinois, Attorney General complaint filed against Perma-Treat.
20. October 24, 1996 Site Screening Inspection Report for Perma-Treat facility.
21. March 24, 1998, R. Budzilek and A. Apperson, Metcalf & Eddy, Inc., VSI Logbook.

APPENDIX A  
Photograph Log





Report Photo No.: 1  
Log Photo No.: 1-7  
Date: 3/24/98

Time: 11:27  
Direction: East

Description: Hazardous Waste Drum Storage Area (SWMU 1).



Report Photo No.: 2  
Log Photo No.: 1-1  
Date: 3/24/98

Time: 11:16  
Direction: South

Description: Area of the current Drip Pad and Sump System (SWMU 3) which is the location of the Former Hazardous Waste Pile (SWMU 2).



Report Photo No.: 3  
Log Photo No.: 1-2  
Date: 3/24/98

Time: 11:16  
Direction: South

Description: Area of the current Drip Pad and Sump System (SWMU 3) which is the location of the Former Hazardous Waste Pile (SWMU 2).





Photo No.: 4  
Log Photo.: 1-3  
Date: 3/24/98

Time: 11:19  
Direction: North

Description: East edge of the Drip Pad and Sump System (SWMU 3) in the vicinity of the Former Hazardous Waste Pile (SWMU 2). Soils were removed from this area during the closure of this unit. Green staining was still present on the side of the pad.



Report Photo No.: 5

Log Photo.: 1-4

Date: 3/24/98

Time: 11:22

Direction: East

Description: View of the south wall of the Treatment Building and Pole Barn in the area of the Former Hazardous Waste Pile (SWMU 2).



Report Photo No.: 6

Log Photo No.: 1-8

Date: 3/24/98

Time: 11:36

Direction: South

Description: View of the door to the Treatment Cylinder and the sump of the Drip Pad and Sump System (SWMU 3).





Report Photo No.: 7  
Log Photo No.: 1-11  
Date: 3/24/98

Time: 11:46  
Direction: Southeast

Description: Sump in the Drip Pad and Sump System (SWMU 3). Note accumulated soils waiting to be drummed.



Report Photo No.: 8  
Log Photo No.: 1-12  
Date: 3/24/98

Time: 11:54  
Direction: East

Description: The sump mud drying rack located in the Tank Room Secondary Containment (SWMU 4). CCA solution which drips from the rack is collected and placed in the Effluent Tank for recycling.





Report Photo No.: 9  
Log Photo No.: 1-13  
Date: 3/24/98

Time: 11:55  
Direction: Southeast

Description: The drum staging area located in the Tank Room Secondary Containment (SWMU 4). The drying rack is located behind and below the drum.



Report Photo No.: 10  
Log Photo No.: 1-9  
Date: 3/24/98

Time: 11:40  
Direction: East

Description: Safety Kleen Unit (SWMU 5) and Used Oil Drum Storage Area (SWMU 6) located in the Mechanics Room. Note staining on the floor in front of the unit.



Report Photo No.:11  
Log Photo No.:1-5  
Date: 3/24/98

Time: 11:26  
Direction: East

Description: View of West Creek which was the receiving water of storm water run-off contaminated by 1988 CCA Spill Area (AOC A).





Report Photo No.: 12  
Log Photo No.: 1-6  
Date: 3/24/98

Time: 11:26  
Direction: West

Description: View of West Creek which was the receiving water of storm water run-off contaminated by 1988 CCA Spill Area (AOC A).



Report Photo No.: 13  
Log Photo No.: 1-21  
Date: 3/24/98

Time: 12:26  
Direction: East

Description: View of 1988 CCA Spill Area (AOC A).



Report Photo No.: 14  
Log Photo No.: 1-22  
Date: 3/24/98

Time: 12:26  
Direction: South

Description: View of 1988 CCA Spill Area (AOC A).





Report Photo No.: 15  
Log Photo No.: 1-10  
Date: 3/24/98

Time: 11:44  
Direction: North

Description: Tractor fluid (virgin) storage area located in the Mechanics Room.



Report Photo No.: 16  
Log Photo No.: 1-14  
Date: 3/24/98

Time: 11:55  
Direction: West

Description: 7,000 Gallon CCA Raw Material Tank (left) and 11,000 gallon Effluent Tank (right) located in the Tank Room.

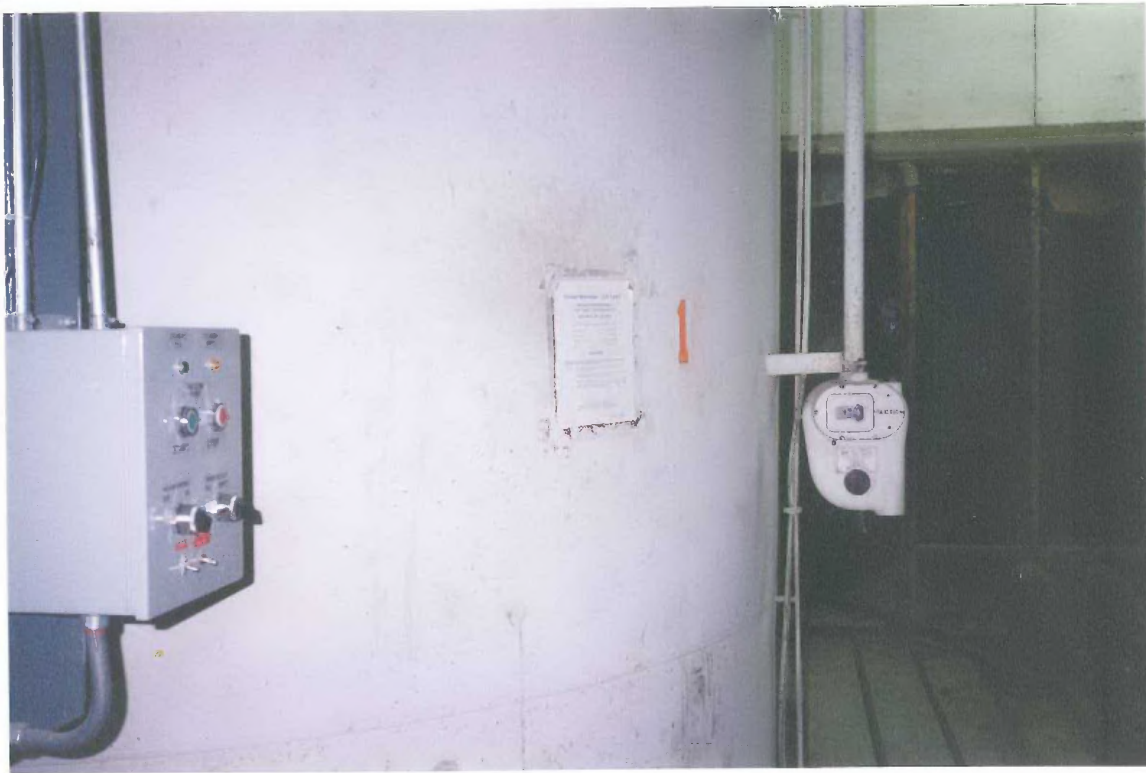




Report Photo No.: 17  
Log Photo No.: 1-15  
Date: 3/24/98

Time: 11:56  
Direction: South

Description: Auxiliary Working Tank located in the Tank Room. This tank contains CCA solution designated for a specific use.



Report Photo No.: 18  
Log Photo No.: 1-16  
Date: 3/24/98

Time: 11:57  
Direction: South

Description: 18,000 Gallon Working Tank located in the Tank Room. This tank contains the primary CCA solution used in the wood treatment process.



Report Photo No.: 19  
Log Photo No.: 1-17  
Date: 3/24/98

Time: 11:59  
Direction: East

Description: Control valves and pumps for the wood treatment cylinder in the Treatment Building.





Report Photo No.: 20  
Log Photo No.: 1-18  
Date: 3/24/98

Time: 12:15  
Direction: West

Description: View of Western Storage Area used to store scrap untreated wood, sheet metal, abandoned tires, windows and other debris. Note apartments in the background (nearest residential units).



Report Photo No.: 21  
Log Photo No.: 1-19  
Date: 3/24/98

Time: 12:16  
Direction: West

Description: Discarded tires, scrap metal, untreated wood and various other debris located in the southeast portion of the Western Storage Area.



Report Photo No.: 22  
Log Photo No.: 1-20  
Date: 3/24/98

Time: 12:20  
Direction: East

Description: Exterior view of Wood Working Shop.

**APPENDIX B**  
**Visual Site Inspection Field Notebooks**

# ENGINEERING & APPLIED SCIENCE

1601 BROADWAY  
MT. VERNON, IL 62864  
OFFICE (618) 244-2611  
e-mail: [raposmy@accessau.net](mailto:raposmy@accessau.net) FAX (618) 244-2612  
or 1 ft.)

To find deflection for a given angle and distance. Multiply the angle by .01745, and the product by the distance.

**RIGHT ANGLE TRIANGLES.** Square the altitude, divide by twice the base. Add quotient to base for hypotenuse.

Given Hyp. 100, Alt.  $25.25^2 \div 200 = 3.125$ ;  $100 - 3.125 = 96.875 = \text{Base}$ .

To find Tons of Rail in one mile of track: multiply weight per yard by 11, and divide by 7.

**LEVELING.** The correction for curvature and refraction, in feet and decimals of feet is equal to  $0.574d^2$ , where  $d$  is the distance in miles. The correction for curvature alone is closely,  $\frac{1}{2}d^2$ . The combined correction is negative.

**PROBABLE ERROR.** If  $d_1, d_2, d_3$ , etc. are the discrepancies of various results from the mean, and if  $\sum d^2$  = the sum of the squares of these differences and  $n$  = the number of observations, then the probable error of the mean =  $\frac{1}{n} \sqrt{\sum d^2}$

$$\text{mean} = \pm 0.6745 \sqrt{\frac{\sum d^2}{n(n-1)}}$$

MINUTES IN DECIMALS OF A DEGREE											
1'	0.167	11'	1.883	21'	3.500	31'	5.117	41'	6.733	51'	8.350
2	.333	12	.200	22	.367	32	.533	42	.700	52	.867
3	.500	13	.217	23	.383	33	.550	43	.717	53	.883
4	.667	14	.233	24	.400	34	.567	44	.733	54	.900
5	.833	15	.250	25	.417	35	.583	45	.750	55	.917
6	1.000	16	.267	26	.433	36	.600	46	.767	56	.933
7	1.167	17	.283	27	.450	37	.617	47	.783	57	.950
8	1.333	18	.300	28	.467	38	.633	48	.800	58	.967
9	1.500	19	.317	29	.483	39	.650	49	.817	59	.983
10	1.667	20	.333	30	.500	40	.667	50	.833	60	1.000

INCHES IN DECIMALS OF A FOOT											
	3/16	3/32	1/8	5/16	3/4	7/8	1	1 1/8	1 1/4	1 3/4	2
1	.0625	.0781	.1194	.1562	.2344	.3594	.4762	.5938	.7188	.8438	.9688
2	.1250	.1562	.2381	.3125	.4708	.7188	.9525	1.1875	1.4375	1.6875	1.9375
3	.1875	.2344	.3594	.4762	.7188	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375
4	.2500	.3125	.4762	.7188	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875
5	.3125	.3906	.5938	.8438	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875
6	.3750	.4762	.7188	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
7	.4375	.5469	.8438	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
8	.5000	.6250	.9375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
9	.5625	.7031	1.0938	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
10	.6250	.7812	1.1875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
11	.6875	.8594	1.2500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
12	.7500	.9375	1.3125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
13	.8125	1.0156	1.3750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
14	.8750	1.0938	1.4375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
15	.9375	1.1719	1.5000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
16	1.0000	1.2500	1.5625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
17	1.0625	1.3281	1.6250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
18	1.1250	1.4062	1.6875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
19	1.1875	1.4844	1.7500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
20	1.2500	1.5625	1.8125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
21	1.3125	1.6406	1.8750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
22	1.3750	1.7188	1.9375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
23	1.4375	1.7969	2.0000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
24	1.5000	1.8750	2.0625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
25	1.5625	1.9531	2.1250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
26	1.6250	2.0312	2.1875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
27	1.6875	2.1094	2.2500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
28	1.7500	2.1875	2.3125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
29	1.8125	2.2656	2.3750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
30	1.8750	2.3438	2.4375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
31	1.9375	2.4219	2.5000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
32	2.0000	2.5000	2.5625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
33	2.0625	2.5781	2.6250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
34	2.1250	2.6562	2.6875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
35	2.1875	2.7344	2.7500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
36	2.2500	2.8125	2.8125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
37	2.3125	2.8906	2.8750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
38	2.3750	2.9688	2.9375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
39	2.4375	3.0469	3.0000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
40	2.5000	3.1250	3.0625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
41	2.5625	3.2031	3.1250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
42	2.6250	3.2812	3.1875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
43	2.6875	3.3594	3.2500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
44	2.7500	3.4375	3.3125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
45	2.8125	3.5156	3.3750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
46	2.8750	3.5938	3.4375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
47	2.9375	3.6719	3.5000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
48	3.0000	3.7500	3.5625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
49	3.0625	3.8281	3.6250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
50	3.1250	3.9062	3.6875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
51	3.1875	3.9844	3.7500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
52	3.2500	4.0625	3.8125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
53	3.3125	4.1406	3.8750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
54	3.3750	4.2188	3.9375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
55	3.4375	4.2969	4.0000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
56	3.5000	4.3750	4.0625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
57	3.5625	4.4531	4.1250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
58	3.6250	4.5312	4.1875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
59	3.6875	4.6094	4.2500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
60	3.7500	4.6875	4.3125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
61	3.8125	4.7656	4.3750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
62	3.8750	4.8438	4.4375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
63	3.9375	4.9219	4.5000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
64	4.0000	5.0000	4.5625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
65	4.0625	5.0781	4.6250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
66	4.1250	5.1562	4.6875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
67	4.1875	5.2344	4.7500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
68	4.2500	5.3125	4.8125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
69	4.3125	5.3906	4.8750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
70	4.3750	5.4688	4.9375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
71	4.4375	5.5469	5.0000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
72	4.5000	5.6250	5.0625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
73	4.5625	5.7031	5.1250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
74	4.6250	5.7812	5.1875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
75	4.6875	5.8594	5.2500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
76	4.7500	5.9375	5.3125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
77	4.8125	6.0156	5.3750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
78	4.8750	6.0938	5.4375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
79	4.9375	6.1719	5.5000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
80	5.0000	6.2500	5.5625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
81	5.0625	6.3281	5.6250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
82	5.1250	6.4062	5.6875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
83	5.1875	6.4844	5.7500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
84	5.2500	6.5625	5.8125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
85	5.3125	6.6406	5.8750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
86	5.3750	6.7188	5.9375	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
87	5.4375	6.7969	6.0000	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
88	5.5000	6.8750	6.0625	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
89	5.5625	6.9531	6.1250	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
90	5.6250	7.0312	6.1875	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
91	5.6875	7.1094	6.2500	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
92	5.7500	7.1875	6.3125	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
93	5.8125	7.2656	6.3750	1.1875	1.4375	1.6875	1.9375	2.1875	2.4375	2.6875	2.9375
94	5.8750	7.3438	6.4375	1.1875	1.4375	1.6875	1.9375	2.187			

1100 Rudy Budd - Penn-Treat  
Chris Edmonds + Penn-Treat  
Matthew R. Farris - Budd

Site water - Marion ~~Area~~ City water  
(intake 1 mile away)

Sanitary waste - City sewer  
- No permits for sewer  
- No air permits

Penna-Trest - Started 1982  
with 10 acres purchased from  
Marion. Additional 5 acres  
purchased ± 1990

No USFS - All tanks are AST

No wells on the property.

DATE	DESCRIPTION	AMOUNT	CHECK NO.	BANK	INITIALS	REMARKS
16-20	employees	84				

1113 US of treatment facility.

Former waste soil storage  
pile area. Indoors

Robert P. Buckland 3/24/98



3/24/98 cont.

2 additional working tanks

(Working tanks have varying conc. of CCA)

Satellite DStaging Area near sump by primary working tank. Partially filled.

Dryas screen box located in the sump in this area.

1201 Transformer on SW side of building.

1203 Trimmer Building suus to trim lumber.

Trimming sold for Greenwood. Shaving and sawdust also sold.

General refuse goes to an dumpster. Shipped to Rolling Clean Disposal.

Robert P. Dwyer 3/24/98

3/24/98 cont.

1210 Main saw building. Empty drums used for banding material. Sent to Guy's Scrap Metal.

1215 Dry Kiln Natural gas fired. Fires noted next to kiln building.

1245 Departed for lunch. Reviewed USI notes.

1330 Arrived back at home - Forest. Asked question from note review.

1345 Departed site. Did perimeter review. Stopped at Williamson County Soil Conservation District Office.

1430 Departed for St. Louis Airport.

Robert P. Dwyer 3/24/98

For Angle A,  $\sin = \frac{a}{c}$ ,  $\cos = \frac{b}{c}$ ,  $\tan = \frac{b}{a}$ ,  $\cot = \frac{a}{b}$ ,  $\sec = \frac{c}{b}$ ,  $\csc = \frac{c}{a}$

Given	Required
$a, b$	$\frac{a}{b} = \cot B, c = \sqrt{a^2 + b^2} = a\sqrt{1 + \frac{b^2}{a^2}}$

$$\sin \alpha = \frac{a}{c} \quad b = \sqrt{(c+a)(c-a)} = c \sqrt{1 - \frac{a^2}{c^2}}$$

$a, b$	$b, c$	$c, a$	$a, b, c$
$A, B$	$B, C$	$C, A$	$A, B, C$
$B = 90^\circ$	$b = a \cot A$	$c = \frac{a}{\sin A}$	

$\frac{q}{F_{vis}}$	$= \frac{v}{v - 0.6} = 1.1$	$v = 0.6$	$\alpha' U$
---------------------	-----------------------------	-----------	-------------

$A, b$	$B, a, c$	$b = 50^\circ - A, c = \sin A, \cos A$
$A, c$	$B, a, b$	$B = 90^\circ - A, a = c \sin A, b = c \cos A$

Given	Required	$a \sin B$	$a \sin C$
-------	----------	------------	------------

$A, B, a$	$b, c, C$	$b = \frac{a \sin B}{\sin A}, C = 180^\circ - (A + B), c = \frac{a \sin C}{\sin A}$
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$$A, a, b \quad B, c, C \quad \sin B = \frac{b \sin A}{a}, C = 180^\circ - (A + B), c = \frac{a \sin C}{\sin A} \quad (a-b) \tan \frac{1}{2}(A+B)$$
$$a, b, c \quad A, B, c \quad A+B=180^\circ-C, \tan \frac{1}{2}(A-B)=\frac{a-b}{a+b} \tan \frac{1}{2}C, a \sin C,$$
$$C = \frac{\sin A}{\sin A}$$
$$a, b, c \quad A, B, C \quad \theta = \frac{a+b+c}{2}, \sin \frac{1}{2} A = \sqrt{\frac{(s-b)(s-c)}{bc}},$$
$$\sin B = \sqrt{\frac{(s-a)(s-c)}{ac}}, C = 180^\circ - (A+B)$$

$a, b, c$       Area       $s = \frac{a+b+c}{3}$ , area  $= \sqrt{s(s-a)(s-b)(s-c)}$

$A, b, c$	Area
	$\text{area} = \frac{bc \sin A}{2}$

$$\frac{d^2 \sin \theta \sin \phi}{d\theta^2}$$

Horizontal distance = Slope distance multiplied by the cosine of the vertical angle. Thus: Slope distance = 318.4 ft. Vertical angle =  $5^{\circ} 10'$ . Since  $\cos 5^{\circ} 10' = .9859$ , horizontal distance =  $310.4 \times .9859 = 318.09$  ft.

Horizontal distance also = Slope distance minus slope distance times (1 - cosine of vertical angle). With the same figures as in the preceding example, the following result is obtained: Cosine of  $5^{\circ} 10'$  = .9859.  $1 - .9859 = .0141$ .

When the rise is known, the horizontal distance is approximately the slope distance less the square of the rise divided by twice the slope distance. Thus:  $\text{rise} = 44 \text{ ft.}$   
 $318.4 \times .001 = 1.31$      $44^2 = 1,936$   
 $\text{slope distance} = 302.8 \text{ ft.}$   
 $\text{Horizontal distance} = 302.8 - \frac{1,936}{2 \times 302.8}$

Photo	Description
3/24/58 cont	
1-1 1116	Former soil storage area (south)
1-2 1118	same as 1-1
1-3 1119	Wall along former soil storage (North)
1-4 1122	East wall of treatment facility (east)
1-5 1126	Drainage ditch along South border (east)
1-6 1128	Same as 1-5 (West)
1-7 1129	Hex Drum Storage Area
1-8 1136	Treatment Cylinder, sump, and (South)
	Sat. DSA (left corner of sump)
1-9 1140	Safety Klean unit w/used oil (east)
1-10 1144	Tractor fluid storage area
1-11 1146	Sinks in sump welling to bedrock (SE)
1-12 1154	Dirt drying box in sump (east)
1-13 1155	Satellite DSA by working Tank (SE)
1-14 1155	Raw MH Tank (left) Effluent tank (right) (West)
1-15 1156	Working Tank (auxiliary) (South)
1-16 1157	Working Tank (South)
1-17 1159	Valve Pump area for Cylinder (east)
1-18 1215	View west Apts. in BG (West)
	Piles of scrap wood visible
1-19 1216	Tire pile (West)
1-20 1220	East view of saw building
1-21 1226	Former Spill Area (Tritmt Bldg) (East)
1-22 1226	Same as 1-21 (South)
Robert P. Beckett 3/24/58	

APPENDIX C  
Facility Location  
Facility Layout and SWMU and AOC Locations



